

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: July 30, 1986

SUBJECT: End of Comment Period for Closure-Ford/Allen Park Clay Mine

FROM: Christine Klemme, PMS

Ch

TO: Carol Witt, TPS

The comment period for Allen Park Clay Mines closure plan ended on July 25, 1986. NO comments were received.

5HS-JCK-13

Ms. Judith Dabanin, Head Librarian
Allen Park Public Library
8100 Allen Road
Allen Park, Michigan 48101

Dear Ms. Dabanin:

Per my telephone conversation with you on May 14, 1986, I am sending a copy of the closure plan and related background materials for the Ford-Allen Park Clay Mine to be made available to the public at the Allen Park Library through July 25, 1986. I am enclosing an advance copy of the Public Notice which will be published in the Allen-Parker on June 25, 1986.

As stated in the Public Notice, the U.S. EPA Region V is encouraging public comments on the closure plan, submitted by Ford-Allen Park, until July 25, 1986.

Please retain the materials on file for public access until July 25, 1986. Please let me know that you have received this material by completing and returning the enclosed verification form.

Thank you very much for your cooperation in assisting our effort to serve the public, and please contact me on (312) 886-3715, if you have any questions.

Sincerely,

Christine Klemme
Solid Waste Branch

Enclosures

Initials Date	Typist ca	Author ca 6/19		AV	PMS KMS Secy	PMS Crist	WMD Chief	WMD Director
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Dave

MAY 04 1989

5HR-13

Ms. Anne St. Onge
2652 Venice
Dearborn, Michigan 48124

Dear Ms. St Onge:

Thank you for your letter to Mr. Lee M. Thomas, former Administrator of the United States Environmental Protection Agency (U.S. EPA), dated April 9, 1989, regarding the permit application for the Ford Clay Mine Hazardous Waste Landfill (Ford) in Allen Park, Michigan. The permit application for the Ford facility was filed under the Resource Conservation and Recovery Act (RCRA) and Michigan's Act 64. Your letter has been referred to me for response.

Under RCRA, location standards address new facility construction within the 100-year flood plain and in seismically active areas, but do not consider the nearby population density. The Ford Allen Park site is consistent with current RCRA siting criteria. The facility will be designed, constructed and operated in full compliance with the regulations and will be protective of human health and the environment. Should conditions change, or if new information is received, permit modification may be initiated by the Agency after permit issuance, if it is necessary to protect human health or the environment.

As the design of Cell I was not consistent with the minimum technology requirements associated with the Hazardous and Solid Waste Amendments of 1984 to RCRA, the Cell ceased accepting waste in May of 1985 and was formally closed in accordance with RCRA in 1986. I would like to emphasize that the closure process outlined above conformed with the provisions of RCRA, and was not the result of violations of the regulations administered by the Michigan Department of Natural Resources.

Presently, the Michigan Cancer Foundation is reviewing the cancer incidence records for the communities of Dearborn, Melvindale, and Allen Park. The purpose of this review is to determine if the observed cancer incidence exceeds the incidence which would be predicted for similar urban areas. The results of this study should be available within the next several months. In addition, the Agency for Toxic Substances and Disease Registry has been petitioned to evaluate the need for a health assessment in the areas proximal to the Allen Park facility.

If you have any further questions regarding this matter, please contact Mr. Richard Traub of my staff, at (312) 886-3136.

Sincerely yours,

ORIGINAL SIGNED BY/
KARL E. BREMER

David A. Ullrich
Associate Director, Office of RCRA
Waste Management Division

bcc: WMD
OR
RPB
D. Petrovski
D. Jordan-Izaguirre/ATSDR
File

Control #OR-037
Due Date 5/5/89

5HR:PETROVSKI:fmd:5/3/89

**Within 10 years

LIST OF CANCER CASES IN AREA BORDERING ASH ST. & VENICE AREA:

Apne Cline^(Son Surviv.)-2660 Linden (Corner ASH) Cancer - Dec'd 1987

Pat Molitar 2643 Willow (Near ASH) (BRAIN)CANCER On treatment 1988

(Mrs. Kenneth)
J. Geasland 53311 Chestnut " " Cancer - Dec'd **
(Husband surviving)-remarried 561-2234

Wife Cor. Carlisle & Ash Cancer - treatment

TOM DURFY On - Ash St. (BRAIN)CANCER - Dec'd 1988
(former Pres.
Snow Wds.Assoc.)

Irene Sopchak 3124 Smith St.(nr Ash) Cancer - Surgery per
(former neighbor)

Adelaide Bryant 3211 Croissant (cr.Ash & Cancer - Dec'd 1985
(Son surviving)-- Carlisle)

Ruth Buchanan 2661 Venice St.(cr.Ash & Lung Cancer- Dec'd **
(Husband surviving)Dbn.Hts. Venice)
Daughter Sybil-Romulus)

Betty Laird 2623 Venice St. Lung Cancer- Dec'd **
(Husband & Son
Everett- 8729Weddel Taylor(292-3071)

Wife 3116 Venice (nr.Ash) Cancer Dec'd 1987
(Husband residing /)

John Beanblossom 2643 Venice " " Lung Cancer- Dec'd 1986

Frieda Darwish 2636 Venice " " Cancer(succesful surge
Chemo-therapy continued
after 5 yr. remission.

Husband 2651 Hollywood " " Throat Cancer Dec'd **
(Wife resides with /
2nd marriage)

Husband (wife resides 3105 Hollywood(cr.Ash) Cancer Dec'd 198
Elsie Suffron 3312 Culver Cancer Dec'd 198
(surviving son
sold home)

Jane Schettl Outer Dr. &Southfield Lung Cancer Dec'd 198
(long-time resident 1950's)
(moved to Grand Rapids 1976's)
Husband Al Schettl remarried-1730 Pembroke,
Grand Rapids, MI44508

Sincerely,

Mrs Ed St Onge
(Mrs.) Edward G. St. Onge

APRIL 29, 1989

Mr. Lee M. Thomas
Environmental Protection Agency
401 M/ S.W.
Washington, D.C. 20460

RE: FILE #MID 980-568-711
ALLEN PARK CLAY MINE

Dear Mr. Thomas:

This letter is being written to call your attention to the problem of issuing a permit to Ford Motor Company. This is for the disposal of toxic waste.

This location is only blocks from three residential areas (Dearborn, Allen Park and Melvindale, Mich.) Also two very large hospitals - Veterans Hospital on Outer Drive and Southfield Rds. and Oakwood Hospital on Oakwood and Southfield Rds.

There have been a number of cancer cases reported and lung problems, since this site was first opened in 1956. In 1986, this site was closed due to violations of DNR regulations for hazardous dumping - which surprised many in the neighborhood.

Please help our Michigan DNR representative do his job, since Michigan showed much concern (in the last election by voting for proposals to clean up the environment and eliminate waste dumping). He certainly should refuse to issue this permit

In the past, you have always done an excellent job and we know you have the interest of the public FIRST on your priority list.

Sincerely,

James St. Onge
2652 Venice
Dearborn, Mich. 48124

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: APR 11 1989

SUBJECT: Health Assessment/Ford Allen Park

FROM: Karl E. Bremer, Chief
RCRA Permitting Branch

ORIGINAL SIGNED BY/
KARL BREMER

TO: Louise Fabinski
Senior Regional Representative
ATSDR

As requested in your memorandum of March 20, 1989, a list of the documents in the Federal RCRA files for the Ford Allen Park facility in Allen Park, Michigan, is attached. A list of the relevant documents housed in the State's RCRA files_x would have to be obtained from the Michigan Department of Natural Resources (MDNR).

If you have any questions regarding this matter, please contact Dave Petrovski at 6-0997.

Attachment

JMS 4/10/89

RCRA PERMITS	TYP.	AUTH.	IL CHIEF	INL CHIEF	MI CHIEF	IN/VI CHIEF	OH CHIEF	RPB CHIEF	C.R. A.D.D.	WATER DR
INIT. DATE	JED 4/7/89	P. J. 4/7/89			RJB 4/7/89			RJB 4/11/89		

RCRA Act 64/Part B Application; Cell II;

Sections-

- Part A Application
- General Facility Description
- Waste Characteristics (handled by the facility)
- Facility Design and Construction
- Groundwater Monitoring
- Procedures to Prevent Hazards
- Contingency Plan
- Personnel Training
- Closure and Post-Closure
- Other Federal Laws
- Part B Certification
- Corrective Action Requirements
- Exposure Information Requirements (Snow Woods Study)
- Environmental Monitoring Programs

Draft Federal Permit; Cell II;

- I Waste Analysis Plan
- II Design Plans for Landfill Cells
- III Construction Quality Assurance Plan
- IV RCRA Corrective Action Plan

Draft State (Act 64) Permit; Cell II;

- Waste Analysis Plan
- Inspection Schedules
- Personnel Training Outline
- Contingency Plan
- Closure Plan
- Post-Closure Plan
- Engineering Plans
- List of Acceptable Waste Types
- Construction Quality Assurance Plan
- Leachate Monitoring Program
- Leak Detection Monitoring Program
- Statistical Procedures
- Surface Water Monitoring Program
- Soil Monitoring Program
- Sedimentation Basin Monitoring Program
- Ambient Air Monitoring Program
- Potentiometric Monitoring Program

Ford's Comments on the Act 64 Draft License; Cell II.

Ford's Comments on the Draft Federal Permit

Ford's Response to the request entitled "Certification Regarding

Potential Releases From Solid Waste Management Units" (includes surface water monitoring data)

Closure Information Regarding Cell I

PSI; Hydrogeological Study, 11-24-81

NTH, Report on Piezometer Installation 3-29-85

Petition For Exemption from Land disposal Restrictions under §268

Compliance Monitoring Evaluation (hydrogeologic data & summary)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

04 JAN 1989

5HR-13

Mr. Wesley F. Furton
United States
Department of Housing and
Urban Development
McNamara Federal Building
477 Michigan Avenue
Detroit, Michigan 48226

Dear Mr. Furton:

This letter is in response to your correspondence dated December 13, 1988, to Mr. Fred Norling of the United States Environmental Protection Agency (U.S. EPA), Region V, regarding the Ford Allen Park Clay Mine Site.

Environmental monitoring at the site, to date, has included groundwater, surface water, and atmospheric sampling. These sampling efforts have indicated that the Allen Park facility does not currently pose a threat to human health or the local environment. The proposed MDNR license for the site includes both surface water and ambient air monitoring. In addition, the draft Federal permit for the facility includes corrective action stipulations, which cover contaminant releases to all environmental media, i.e., groundwater, surface water, soil, sediment, or the atmosphere. Should future monitoring activities document the presence of contaminant releases at the facility, the resultant contamination and any associated environmental or health risk would be remediated under these corrective action provisions.

If we can be of further assistance in this matter, please contact Mr. Dave Petrovski of my staff, at (312) 886-0997.

Sincerely,

Karl E. Bremer, Chief
RCRA Permitting Branch

cc: Mary Canavan
Lynnea Olsen, Congressman Dingell's Office

04 JAN 1989

5HR-13

Mr. Wesley F. Furton
United States
Department of Housing and
Urban Development
McNamara Federal Building
477 Michigan Avenue
Detroit, Michigan 48226

Dear Mr. Furton:

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Environmental monitoring at the site, to date, has included groundwater, surface water, and atmospheric sampling. These sampling efforts have indicated that the Allen Park facility does not currently pose a threat to human health or the local environment. The proposed MDNR license for the site includes both surface water and ambient air monitoring. In addition, the draft Federal permit for the facility includes corrective action stipulations, which cover contaminant releases to all environmental media, i.e., groundwater, surface water, soil, sediment, or the atmosphere. Should future monitoring activities document the presence of contaminant releases at the facility, the resultant contamination and any associated environmental or health risk would be remediated under these corrective action provisions.

If we can be of further assistance in this matter, please contact Mr. Dave Petrovski of my staff, at (312) 886-0997.

Sincerely,

ORIGINAL SIGNED BY/
KARL E. BREMER

Karl E. Bremer, Chief
RCRA Permitting Branch

cc: Mary Canavan
Lynnea Olsen, Congressman Dingell's Office

5HR-13:PETROVSKI:fd:js:6-6161:12/30/88:PC B:FURTON

2/14/89

RCRA PERMITS	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	RPB CHIEF	O.R. A.D.D.	TV D.F.
INIT. DATE	JUD 1-04-89	[Signature] 1-4-89			[Signature] 1/4/89			[Signature] 1/4/89		

CONTROL

CONTROL NUMBER:

ORA-463

*(second group of letters)
closed with this #*

DATE DISTRIBUTED:

12/14/88

DISTRIBUTED TO:

Office of RCRA

Bremer/Thant

PMB

RPB

REB

OUST

COMMENTS DUE BY:

none due date

SPECIAL INSTRUCTIONS OR COMMENTS:

for RA

^F1^

^F2^

^F3^

Dear ^F4^:

Thank you for your letter regarding the permit application for the Ford Clay Mine Hazardous Waste Landfill (Ford) in Allen Park, Michigan. The permit application for the Ford facility was filed under the Resource Conservation and Recovery Act (RCRA) and Michigan's Act 64. The concerns provided in your letter have been referred to me for response and are discussed below.

The State of Michigan received "final authorization" to operate the RCRA program in lieu of the Federal Government in October 1986. Consequently, Michigan's responsibilities cover all aspects of the RCRA Program, including participation in permit approval or denial decisions, except those authorities associated with the Hazardous and Solid Waste Amendments (HSWA) to RCRA, as promulgated in 1984. Responsibility for the implementation of the HSWA provisions resides with the United States Environmental Protection Agency (U.S. EPA).

The HSWA regulations prohibit the disposal of liquids and restricted wastes, ensure proper landfill design, require the Permittee to minimize all generated wastes, and mandate that any release of contaminants be characterized and remedied. The Ford application complies with all aspects of the HSWA regulations. The permit is our mechanism for imposing stricter environmental requirements on the site than those currently in place. Should the permit be issued, the associated Corrective Action Plan will require Ford to investigate and subsequently remediate all past or present releases and related contamination from any of the existing solid or hazardous waste units at the site. These corrective action requirements apply to any releases to groundwater, surface water, soil, sediment, or the atmosphere, and will reassess the impact of the facility on public health and the environment. If the U.S. EPA determines that the Ford Allen Park facility represents any type of health risk to the local community, such a risk would be addressed through the corrective action provisions in the permit.

Environmental monitoring at the Ford Allen Park facility, to date, has included groundwater, surface water, and air sampling. The sampling results indicate that the facility does not pose any threat to human health or the environment. The proposed Michigan Department of Natural Resource (MDNR) license and the Federal permit for the facility will include both surface water and ambient air

monitoring. Under the corrective action provisions of the Federal permit, if future monitoring activities document the presence of contaminant releases at the site, the release and any contamination associated with the release would be remediated.

Under RCRA, the siting criteria address new facility construction within the 100-year flood plain and in seismically active areas, but do not consider the nearby population density. The Ford Allen Park site is consistent with current RCRA siting criteria. The facility will be designed, constructed and operated in full compliance with the regulations and will be protective of human health and the environment. Should conditions change or if new information is received, permit modification may be initiated by the Agency after permit issuance, if it is necessary to protect human health or the environment.

If this facility is approved, all hazardous wastes placed in this landfill would have to be treated to the standards which have been set by the U.S. EPA under the Land Disposal Restrictions. These treatment standards have been established to substantially reduce the toxicity and mobility of the wastes prior to placement in a RCRA land disposal unit. This will minimize the short-term and long-term uncertainties associated with disposal.

Under HSWA, Congress stipulated that final permits for existing hazardous waste landfills be issued or denied by November 8, 1988. As defined by Congress, the decision to issue or deny a permit application depends upon the completeness of the application and its technical adequacy in meeting Federal and State regulations. Statements attributed to the MDNR regarding "pressure" from U.S. EPA apparently refer to this Congressionally mandated deadline for the issuance or denial of all RCRA landfill permit applications.

As part of the RCRA permitting process, the U.S. EPA and MDNR must review and address all pertinent comments received during the public comment period, prior to permit issuance or denial. When the final decision on the Ford Allen Park permit is made, the responses to comments will be included in the official permit file, and will be available to the public upon request.

Thank you for your interest and concern in this matter.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Valdas V. Adamkus". The signature is fluid and cursive, with a long, sweeping horizontal stroke at the end.

Valdas V. Adamkus
Regional Administrator

Ms. Gloria Allen
257 Bayside
Detroit, MI 48217

Mr. Armondo G. Alviani
8 Carlisle Ct.
Dearborn, MI 48124

Ms. Rachel S. Ballnik
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Dearborn, MI 48124

Mrs. Elizabeth Bart
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Mr. Paul Bonkoski
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Mr. Henry Eeck
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Mr. Michael Fenell
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Mr. Ron Francis
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Mr. Walter Glovier
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Mr. Thomas Griffen
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Ms. Sheryl Harmon
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Ms. Delores Hillbush
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Mr. Donald B. Hubbert
1560 Culver
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Mrs. Catherine Hubbert
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Ms. Clara Janigian
1906 Southfield
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Ms. Esther Janigian
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Mrs. Gertrude Jones
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Mr. Lesmeister

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Mr. David Madge
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Taylor, MI 48180

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Dearborn, MI 48124

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Dearborn, MI 48124

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Detroit, MI 48209

Mr. John Milberg
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Dearborn, MI 48124

Ms. Debra Needham
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Detroit, MI 48217

Ms. Eileen M. Nieves
3362 Raymond
Dearborn, MI 48124

Mr. Manuel Nieves
3362 Raymond
Dearborn, MI 48124

Mr. Thomas R. Noonan
1785 Venice
Dearborn, MI 48124

Ms. Debra Ober
3354 Raymond
Dearborn, MI 48124

Mrs. William Orr
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Ms. Orsolina Oselin and Ms. Victoria Pagot
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Dearborn, MI 48124

Ms. Alice Paputa
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Dearborn, MI 48124

Ms. Stephanie Parrino
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Dearborn, MI 48124

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Dearborn, MI 48124

Mr. David Rusinowski
2621 Edgewood
Dearborn, MI 48124
Mr. Rusinowski

Ms. Judy Rusinowski
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Dearborn, MI 48124

Mr. Ken Rusinowski
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Ms. Maria A Schuetze
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Ms. Anne Sienkiewicz
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Ms. Gabriel Smiljan
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Ms. Belva Smith
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Dearborn, MI 48124

Ms. Clara Smith
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Ms. Sophie Speer
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Melvindale, MI 48122

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Ms. Mary Jane Treves
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Dearborn, MI 48124

Mr. Clarence Vos
1717 Linden
Dearborn, MI 48124

Mr. Willis E. Wagner
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Mr. Ron Wallis
2451 Monroe
Dearborn, MI 48124

Mr. Walter Wozniak
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Dearborn, MI 48124

Ms. Barbara Yeager
1795 Sherwood Court
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Mr. Harold Blake
1131 Linden
Dearborn, MI 48124

Ms. Charlotte Gay
3262 Campbell
Dearborn, MI 48124

Mr. Gasper Volpe
18535 Audette
Dearborn, Michigan 48124

Mr. Richard Huard
1930 Willow
Dearborn, Michigan 48124

Mr. and Mrs. Stuart and Francis Baker
1431 Hollywood
Dearborn, MI 48124

Mr. and Mrs. Edward and Betty Bennett
1727 Linden
Dearborn, MI 48124

Mr. and Mrs. Donald and Barbara Birkenhier
1470 Linden
Dearborn, MI 48124

Mr. and Mrs. Paul and Ann Bossio
3513 Raymond
Dearborn, MI 48124

Mr. and Mrs. Gerald F. and Virginia A. Carroll
3444 Raymond Ave.
Dearborn, MI 48124

Mr. and Mrs. Damiani
18801 Snow
Dearborn, MI 48124

Mr. and Mrs. Franklin and Evelyn W. Davidson
1568 Birchcrest
Dearborn, MI 48124

Mr. and Mrs. John DePoli
1413 Venice Street
Dearborn, MI 48124

Mr. and Mrs. Adolph and Vera Dubicki
3174 Smith
Dearborn, MI 48124

Mr. and Mrs. Mike and Donna Favor
2644 Edgewood
Dearborn, MI 48124

Mr. and Mrs. Victor Flowers
17429 Russell
Allen Park, MI 48101

Mr. and Mrs. Larry and Shirley Ganzini
1820 Southfield Road
Dearborn, MI 48124

Mr. and Mrs. Robert C. and Margaret Kirby
3231 Culver
Dearborn, MI 48124

Mr. and Mrs. Klink
332 S. Dumeries
Detroit, MI 48217

Mr. and Mrs. Armand and Beverly Kohlstrand
2037 Chestnut
Dearborn, MI 48124

Mr. and Mrs. Paul and Amelia Kulcsar
1906 Culver
Dearborn, MI 48124

Mr. and Mrs. Lamberg
1504 Venice
Dearborn, MI 48124

Mr. and Mrs. Leo K. Le Blanc
19025 Audette Street
Dearborn, MI 48124

Mr. and Mrs. Anthony and Rose Marie Lividini
304 South Bayside
Detroit, MI 48217

Mr. and Mrs. Robert and Evelyn Martin
1516 Walnut
Dearborn, MI 48124

Mr. and Mrs. Bruce and Lola McDowell
463 Bayside
Detroit, MI 48217

Mr. and Mrs. Ronald and Diane McKay
1916 Houston
Dearborn, MI 48124

Mr. and Mrs. John and Christine McNeil
1737 Walnut Street
Dearborn, MI 48124

Mr. and Mrs. Madyln and Fred Mitchell
1450 Walnut
Dearborn, MI 48124

Mr. and Mrs. Doinino and Emily Nalli
1852 Walnut
Dearborn, MI 48124

Mr. and Mrs. John F. Pfeiffer
1665 Birchcrest Drive
Dearborn, MI 48124

Mr. and Mrs P. Syrian
1960 Venice Street
Dearborn, MI 48124

Mr. And Mrs. Patrick Taglioli
1527 Culver
Dearborn, MI 48124

The Tilhof Family
19224 Audette
Dearborn, MI 48124

Mr. and Mrs. Peter Tocket
548 South Waring
Detroit, MI 48217

Mr. and Mrs. John and Helen Varasdi
2640 Detroit Street
Dearborn, MI 48124

Mr. and Mrs. John Vitale
17901 Snow
Dearborn, MI 48124

Mr. and Mrs. Earl and Ruth Warner
18519 Audette
Dearborn, MI 48124

Mr. and Mrs. Max A. and Cecelia M. Weston
1658 Birchcrest Drive
Dearborn, MI 48124

Mr. and Mrs. Frank and Carol Zdero
18425 Snow Road
Dearborn, MI 48124

Mr. and Mrs. Edward and Rita Bonkowski
17394 Palmer
Melvindale, MI 48122

Mr. and Ms. August and Magdalena Schmidt
1266 Linden
Dearborn, MI 48124

Chris

5H-12

14 DEC 1988

Mr. John A. Brown
1286 Linden Street
Dearborn, Michigan 48124

Dear Mr. Brown:

Thank you for your letter to Mr. Lee Thomas, dated November 22, 1988. Your letter was in regard to the proposed hazardous waste landfill at the Ford Allen Park Facility in Allen Park, Michigan, and it has been referred to me for response.

Ford's application for this facility was filed under the Resource Conservation and Recovery Act (RCRA) and the State of Michigan's Act 64. The section of the facility devoted to hazardous waste disposal activities covers 17 acres, while the remainder of the 260 acre facility is used for solid waste disposal operations.

The State of Michigan received "final authorization", under RCRA, in October 1986. Consequently, Michigan's responsibilities cover all aspects of the RCRA Program, except those authorities associated with the Hazardous and Solid Waste Amendments (HSWA) to RCRA, as promulgated in 1984. Responsibility for the implementation of HSWA provisions resides with the United States Environmental Protection Agency (U.S. EPA). Included in the HSWA provisions are authorities which: prohibit the land disposal of liquids and restricted wastes, ensure proper facility design, require the minimization of any generated wastes, and compel the characterization and remediation of all contaminant releases at the site. The Ford application for the Allen Park facility complies with all aspects of the HSWA regulations.

The corrective action stipulations included in the draft Federal permit would, if implemented, require Ford to document and remediate any existing contamination resulting from past or present releases from all of the solid or hazardous waste units at the site. These provisions would cover contaminant releases to all environmental media, i.e., ground water, surface water, soil, sediment, and the atmosphere. Should the Allen Park facility presently represent any type of health risk to the local community, such a risk would be required to be eliminated through the corrective action provisions.

Your letter referenced a statement by Mr. Pete Quackenbush of the Michigan Department of Natural Resources (MDNR) which was cited in the Detroit News on November 18, 1988. According to the Detroit News, Mr. Quackenbush was quoted as saying, "The DNR is under pressure from the U.S. Environmental Protection Agency to license the dump and will probably issue a permit in the next few weeks." In 1984, as part of HSWA, Congress stipulated that the final permits for all the existing applications for hazardous waste landfills in the United States be issued or denied by November 8, 1988. The statement attributed to Mr. Quackenbush may be a reference to this Congressionally mandated deadline for the issuance or denial of all RCRA landfill permits.

Presently, the Michigan Cancer Foundation is reviewing the cancer incidence records for the communities of Dearborn, Melvindale, and Allen Park. The purpose of this review is to determine if the rate of cancer incidence exceeds the incidence which would be predicted for similar urban areas. The results of this study should be available early next year.

As part of the RCRA permitting processing, The U.S. EPA and MDNR must review and address all pertinent comments received during the public comment period prior to permit issuance or denial. When the final decision on the Ford Allen Park permit is made, the comment responses will be included in the official permit file, and will be available to the public upon request.

If you have any further question regarding this matter, please contact Mr. Richard Traub of my staff, at (312) 886-6136.

Sincerely,

ORIGINAL SIGNED BY,
DAVID A. ULLRICH

Basil G. Constantelos, Director
Waste Management Division

bcc: K. Westlake, ORA, w/control slip
ORA w/control slip
AX
R. Traub, w/incoming & control slip
File w/incoming & control slip
RPB (Chris) w/incoming & control slip
3 blue tissues
1 pink tissue

Control No. ORA-463
Due Date: 12/15/88

OR (yellow copy)

C: WND
CC: ORA
WESTLAKE

Mr. Lee M. Thomas, Administrator
U.S. E. P. A.
Wash., D. C.
Dear Mr. Thomas,

Nov. 22, 1988
1286 Linden
Dearborn, Mi. 48124

I am writing you concerning a toxic waste dump located only 3 blocks from my home - and many others. I refer to the Ford Motor Company's request for a Permit to Michigan's Department of Natural Resources & the E. P. A. to dump more Toxic waste there. EPA File Number - MI D 980-568-711.

God only knows what the overall adverse effect this toxic waste dump has had and will have on the health & welfare of those of us who live nearby. The Ford Motor Company have buried Toxic waste and other refuse in their Allen Park, Mi. dump from 1956 thru 1986. While the Permit request is for a 12 acre cell, rest assured almost all of the total 260 acre site has been filled already.

Mr. Peter Quackenbush, DNR. Environmental Engineer for the State of Michigan is quoted in an article in the Detroit News dated Nov. 18, 1988 as saying - "The DNR is under pressure from the U.S. Environmental Protection Agency to license the dump and will probably issue a permit in the next few weeks."

Because of evidence of higher than usual cancer rates in our neighborhood, the Michigan Department of Public Health has ordered a new study.

been reviewed, studied & published.

I would appreciate a reply from
you, Mr. Thomas on this matter.

I thank you for your attention.

Sincerely,

John A. Brown

Mr. ~~John~~ John A. Brown
1286 Linden St.
Dearborn, MI 48124

U.S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

DEC 01 1988

RECEIVED

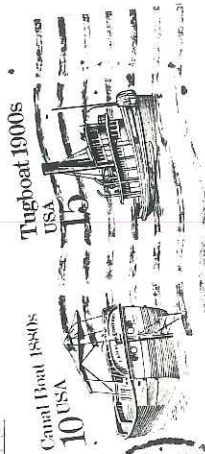
88 NOV 28 4:31

18/210
EPA
CORR. CONTROL

RECEIVED

46

Mr. & Mrs. John A. Brown
1286 Linden St.
Dearborn, MI 48124



Mr. Lee M. Thomas, Administrator
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

ORA 463/88
Chris

CONTROLLED CORRESPONDENCE

OFFICE OF THE REGIONAL ADMINISTRATOR (5RA - 14)

Lick Tranb

FROM : JOHN BROWN
1286 LINDEN STREET
DEARBORN, MICHIGAN

CONTROL NO : ORA - 463
DATE RECEIVED : 12/ 1/88
DUE DATE : 12/15/88

CONSTITUENT :

EXTENSION :
INTERIM :
FINAL DUE DATE :

SUBJECT : FORD MOTOR CO/PERMIT/TOXIC WASTE

ASSIGNED TO : WMD OR 12/2/88

DATE : 12/ 1/88

SIGNATURE : DIVISION DIRECTOR

DATE : / /

COURTESY COPIES :

- | | |
|-----------------------|-------------|
| 1) ORA W/CONTROL SLIP | 2) WESTLAKE |
| 3) AX | 4) |

SPECIAL INSTRUCTIONS :

Coordinate Extension Requests With Appropriate ORA Staff Person : ORA, 3-1080

14 DEC 1988

Ms. Alice Paputa
18019 Snow Road
Dearborn, Michigan 48124

Dear Ms. Paputa:

Thank you for your letter of November 22, 1988, regarding the proposed hazardous waste landfill at the Ford Allen Park Facility in Allen Park, Michigan. Your correspondence to Mr. Lee Thomas has been referred to me for response.

The State of Michigan received "final authorization", under RCRA, in October 1986. Consequently, Michigan's responsibilities cover all aspects of the RCRA Program, except those authorities associated with the Hazardous and Solid Waste Amendments (HSWA) to RCRA, as promulgated in 1984. Responsibility for the implementation of HSWA provisions resides with the United States Environmental Protection Agency (U.S. EPA). Included in the HSWA provisions are authorities which: prohibit the land disposal of liquids and restricted wastes, ensure proper facility design, require the minimization of any generated wastes, and compel the characterization and remediation of all contaminant releases at the site. The Ford application for the Allen Park facility complies with all aspects of the HSWA regulations.

The corrective action stipulations included in the draft Federal permit would, if implemented, require Ford to document and remediate any existing contamination resulting from past or present releases from all of the solid or hazardous waste units at the site. These provisions would cover contaminant releases to all environmental media, i.e., ground water, surface water, soil, sediment, and the atmosphere. Should the Allen Park facility presently represent any type of health risk to the local community, such a risk would be required to be eliminated through the corrective action provisions.

In 1984, as part of HSWA, Congress stipulated that final permits for all applications for all existing hazardous waste landfills be issued or denied by November 8, 1988. Issuance or denial is dependent upon the completeness and technical adequacy of the application with Federal and State RCRA Regulations as defined by Congress. The response of the

Michigan Department of Natural Resources (MDNR) cited in your letter is probably a reference to this Congressionally mandated deadline for the issuance or denial of all RCRA landfill permits.

As part of the RCRA permitting processing, The U.S. EPA and MDNR must review and address all pertinent comments received during the public comment period prior to permit issuance or denial. When the final decision on the Ford Allen Park permit is made, the comment responses will be included in the official permit file, and will be available to the public upon request.

If I could be of further assistance, please contact Mr. Richard Traub of my staff, at (312) 886-6136.

Sincerely,

ORIGINAL SIGNED BY
DAVID A. ULLRICH

Basil G. Constantelos, Director
Waste Management Division

bcc: K. Westlake, ORA, w/control slip	Control No. ORA-468
ORA w/control slip	Due Date: 12/16/88
AX	
R. Traub, w/incoming & control slip	OR (yellow copy)
File w/incoming & control slip	
RPB (Chris) w/incoming & control slip	
3 blue tissues	
1 pink tissue	

5HR-13:PETROVSKI:js:6/6161:12/8/88:PC Disk:ORA.468

Dear Mr. Thomas,

I would appreciate your
attention.

Answer to the following questions:
Writing to the State AGMR,
Writing to the State AGMR.

C: WMD
CC: ORA
WESTLAKE

C.M.-972314097

U.S. DEPARTMENT OF JUSTICE
OFFICE OF ATTORNEY GENERAL

060 02 1798

DECLASSIFIED

have they to do to protect
they are paid to protect
us ... Big Business

2. Service rendered above Big Bear
and ...
and Water Co.)

(like the $\mathbb{C}P^1$?)

the Tall - 1. 41 feet

due this
do not want them dumped
back yard. (Antennae - Southgate
Drive - I-94 Expressway)
two hospitals.

I should be extremely ^{pleased} to
 have you make personal attention to
 your immediate appreciation also
 the well be greatly from you and
 I am expecting a reply from you
 (I am expecting)
 Yours truly,
 Wm. W. W.

18019 Snow Road
Gleason, Mich.
48124



W227

Mr. Lee M. Thomas, Administrator
Protective Agency Environmental
401 M. South West
Washington, D.C. 20460

RETURN RECEIPT
REQUESTED

CONTROLLED CORRESPONDENCE

OFFICE OF THE REGIONAL ADMINISTRATOR (5RA - 14)

ORA 468/88

Chris

FROM : ALICE PAPUTA
18019 SNOW ROAD
DEARBORN, MICHIGAN

CONTROL NO : ORA - 468

DATE RECEIVED : 12/ 2/88

DUE DATE : 12/16/88

EXTENSION :

CONSTITUENT :

INTERIM :

FINAL DUE DATE :

SUBJECT : FORD MOTOR COMPANY/COMPLAINT

ASSIGNED TO : WMD

OR 12/5/88

DATE : 12/ 2/88

SIGNATURE : DIVISION DIRECTOR

RPB
12/6/88

DATE : / /

COURTESY COPIES :

1) ORA W/CONTROL SLIP

2) WESTLAKE

3) AX

4)

SPECIAL INSTRUCTIONS :

Coordinate Extension Requests With Appropriate ORA Staff Person : ORA, 3-1080



U.S. Department of Housing and Urban Development
Detroit Area Office, Region V
McNamara Federal Building
477 Michigan Avenue
Detroit, Michigan 48226

RECEIVED
DEC 13 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

DEC 13 1988

Mr. Fred R. Norling
Project Officer
Environmental Protection Agency
Region V
Waste Management Division (5HS-12)
230 South Dearborn Street
Chicago, IL 60604

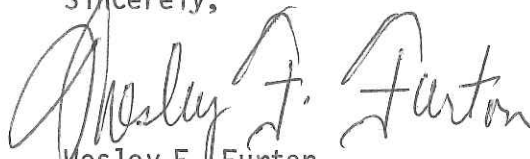
Dear Mr. Norling:

As directed by HUD Notice 79-33 Policy Guidance to Address the Problems Posed by Toxic Chemicals and Radioactive Materials, technical opinion is requested in regard to the Ford Motor Company. Allen Park Clay Mine Site, located at Oakwood Boulevard and Southfield. HUD has been requested to provide FHA Insurance for a single family property on Linden Street in Dearborn, Michigan, as indicated in the attached map, and must consider the impact of the proximity of the property to the fill site as health and safety might be affected.

Please confirm a telephone call to Mr. David Petrovski (883-6136) on December 7, 1988 that there is no evidence of adverse impact on human health in the area.

In our effort to provide service, your prompt response will be appreciated and for I may be contacted at FTS 226-4346.

Sincerely,


Wesley F. Furton
Environmental Officer

Attachment

Mr. Fred R. Norling
Project Officer
Environmental Protection Agency
Region V
Waste Management Division (5HS-12)
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Norling:

As directed by HUD Notice 79-33 Policy Guidance to Address the Problems Posed by Toxic Chemicals and Radioactive Materials, technical opinion is requested in regard to the Ford Motor Company, Allen Park Clay Mine Site, located at Oakwood Boulevard and Southfield. HUD has been requested to provide FHA Insurance for a single family property on Linden Street in Dearborn, Michigan, as indicated in the attached map, and must consider the impact of the proximity of the property to the fill site as health and safety might be affected.

Please confirm a telephone call to Mr. David Petrovski (883-6136) on December 7, 1988 that there is no evidence of adverse impact on human health in the area.

In our effort to provide service, your prompt response will be appreciated and for I may be contacted at FTS 226-4345.

Sincerely,

Wesley F. Furton
Environmental Officer

Attachment

C: Furton
C: Brown

C:Furton/pt/12-08-88/4343/Doc # 0673G

RECEIVED
DEC 27 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Correspondence Code	Originator	Concurrence	Concurrence	Concurrence	Concurrence	Concurrence
	FURTON	BROWN				
Date	12/13/88					

Previous edition is obsolete.

U.S. Department of Housing and Urban Development
Official Record Copy

HUD-713 (4-80)
HUD-2221.1

★U.S.GPO:1987-0-193-957



WILLIAMS & V
CITY ENGINEER
963-046
REVISED DECEMBER
REVISED NOVEMBER

ZONING

U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

UNDER SECRETARY

NOTICE

79-33

September 10, 1979

EXPIRES: Indefinite (per Under Secretary)

TO: Headquarters Principal Staff, Regional Administrators and Principal
Regional Staff, Area Managers and Principal Staff, Other Field Office
Supervisors and Principal Staff

SUBJECT: Policy Guidance to Address the Problems Posed by Toxic
Chemicals and Radioactive Materials

1. Purpose. This Notice provides policy guidance to address the problems posed by man-made environmental hazards such as toxic chemical and radioactive materials. The goal is to establish consistent Departmental procedures for recognizing such hazards and for protecting the health and safety of the public, and for minimizing their impact on HUD assisted activities. This policy pertains to all Department of Housing and Urban Development programs. Regional Administrators and field office managers and supervisors should assure that this Notice is distributed to all employees whose responsibilities are affected by the Notice. Until sufficient information becomes available to incorporate detailed instructions regarding the relationships of HUD programs to hazardous sites into existing handbooks, etc., the guidance provided below is in effect.

Field offices should consult with the CPD office of Environmental Quality on technical issues or procedural matters pertaining to this Notice.

2. Background. In recent months, the awareness of dangers to public health caused by exposure to toxic chemical and radioactive materials and other man-made hazards has increased dramatically. The Department's experience in responding to such problems as the dangers of radiation exposure related to the activities of the Rocky Flats, Colorado plutonium processing facility, as well as the Love Canal problem in Niagara Falls, New York (where toxic chemicals buried years ago are now posing a significant threat to residents in the area), has demonstrated the serious difficulties and great losses that can occur for individuals and the community. The nature of the Department's programs, particularly our role in insuring and sub-

UF:DISTRIBUTION: W-1, W-2, W-3-1, R-1, R-2, R-3, R-4, R-4-1, R-5, R-5-1

sidizing housing units and in providing funds for community planning and development--activities which can be uniquely vulnerable to environmental hazards--mandates a special effort to safeguard the health of the people and the integrity of the programs that serve them. It is critical that the Department make every effort to prevent future exposure of the public by anticipating and avoiding problem locations. In addition, the Department must establish routine procedures for addressing problems where development has already occurred.

3. Environmental Hazards Task Force. To address the problems of hazardous waste disposal and to assist in implementing the policy, the Secretary has established an Environmental Hazards Task Force. The Task Force has been charged with the following responsibilities:

- Draft a Departmental policy to guide HUD's responses to future problem situations;
- Assess the potential overall impact on HUD mortgage insurance and housing assistance programs and community development programs;
- Establish interagency and intergovernmental policies and procedures to improve data on the location and extent of environmental contamination; and to take consistent actions when responsibilities are shared by several agencies; and
- Continue to monitor the Love Canal and Rocky Flats actions.

4. Policy. The Task Force has reviewed existing HUD environmental review procedures, and has determined that these procedures are sufficiently broad to permit field offices to address many potential environmental hazards during the application process.

The procedures outlined in current issuances should be closely followed in determining eligibility of a proposal for HUD funding. To the extent that current procedures are not adequate for a specific situation, the following policy will prevail:

A. New Construction

Upon receipt of an application for HUD support of any new construction on a site that is suspected of posing a potential environmental hazard:

- (1) All pertinent material relating to the hazard will be gathered and assembled by the Field Office.
- (2) Complete analysis of the hazardous site will be made using the best talent available in the Field Office and the Regional Office, as required. Such things as distance from the site, type of materials dumped or manufactured, wind directions and effects of waterways or drainage will be reviewed.
- (3) If it is clear that the site would pose a serious health risk for inhabitants, a reject rating will be entered on the ECO 2/3. Part C "Site Suitability Analysis" and in Part I, as required. The sponsor should be so notified.
- (4) In all other cases, the following steps must be taken if there is a potential or possible exposure to these hazards:
 - (a) Notify the Regional ECO and request a review of the site by EPA, Office of Solid Waste Management.
 - (b) Furnish the EPA with all pertinent material and request any information they might have on the hazard site.
 - (c) Notify the sponsor of the action and the anticipated delay.
 - (d) Notify the Chairman of the Environmental Task Force through the Regional Administrator's Office.
 - (e) If the EPA review indicates that a hazard exists, or if in EPA's judgment a reasonable doubt continues to exist and cannot be addressed through remedial measures, the project or proposed subdivision should be rejected and written notification made to the Chairman, Environmental Hazards Task Force. Any public announcement of a rejection will not be made until it is cleared by the Task Force.
 - (f) If the EPA review indicates that the site is acceptable for habitation, processing will be continued and appropriate applicants or other applicable parties will be notified of the determination.

B. Request for Assistance on Existing Properties

In some instances, it may be found that existing properties are submitted for mortgage insurance, rehabilitation grants, Section 8 subsidies, etc., and the property is found to be on or near a hazardous waste site or in close proximity to radioactive materials.

- (1) With respect to an existing property, criteria found in outstanding instructions will be used to determine acceptability of the submitted application. No existing property can be accepted for mortgage insurance where a hazard is known to exist that will affect the health and safety of the homeowner. Where a hazard is "possible" or "potential" but is unproven, and where the appraiser cannot determine the nature of the hazard and its effect on the subject property, the field offices should immediately request a technical opinion from EPA, and in the same manner as "new construction" inform Headquarters on action to be taken concerning the area. In all cases where approval is granted, despite the existence of a potential hazard, a full and complete disclosure shall be made to purchasers in a form approved by the Secretary. The Task Force will coordinate the development of appropriate disclosure documents.

C. Locally Approved Sites

If a state or local health or environmental agency approves a project, or a geographic area in which projects may be approved--and the project or project area lies within a site identified by EPA as hazardous, or where the field office believes that a reasonable doubt exists about the health and safety of the area--such state or local certification may be accepted only if EPA notifies HUD that HUD may rely upon the certification of that agency.

If a state or local health department or other environmental unit of State or local government has already determined that a site is subject to any of the above environmental hazards at the time a proposal is received, the proposal will be rejected without reference to EPA.

D. Community Development Activities

Community development representatives should advise local communities not to utilize CDBG funds on activities supporting new development for habitation at locations affected by toxic chemicals and radioactive materials.

5. Site Identification. The Environmental Hazards Task Force is working with the Environmental Protection Agency (EPA) to obtain specific locations for sites that are identified as potentially hazardous. The first group of sites has already been forwarded to you by Assistant Secretary Embry's memorandum of June 14, 1979. Where the acceptability of the sites included on the EPA list is unclear, further inquiry of the EPA should be made. Additional information will be forwarded as EPA provides it. A copy of Assistant Secretary Embry's memorandum is attached.

It is intended that all current environmental policies and procedures shall be adhered to and that the environmental review process be amended to include a screening to assure that project sites are not located in proximity of sites which are affected by toxic chemicals or radioactive substances. Particular attention should be given to any proposed site in the general proximity of dumps, landfills, or industrial locations that might contain hazardous wastes.

Environmental Clearance Officers should make reasonable and practicable efforts to obtain information on potentially hazardous sites from local and state agencies that would normally gather such information.

As additional sites not included in the EPA list are identified by the field, notification will be made to the Regional Administrators and the Task Force. Likewise, should additional sites be identified by the Regional Office, notification will be made to Area Managers and the Task Force.

Cases where an environmental hazard exists which may affect residents in existing HUD supported construction should also be brought to the attention of the Task Force. This policy will be followed even if no new applications for HUD assistance are pending at that particular site.

Problems requiring Task Force consideration should be sent to:

Mr. Alan Kappeler, Chairman
Environmental Hazards Task Force
Room 4108
451 7th Street, S.W.
Washington, D.C. 20410
Telephone: (202) 755-8182

Attachment

December 5, 1988

Mr. Lee M. Thomas, Administrator
Environmental Protection Agency
401 M, S.W.
Washington DC 20460

Ref: MID 980-568-711

Dear Mr. Thomas:

As a Dearborn homeowner and taxpayer, I would like to voice my concern about proposed plans to permit Ford Motor Company to dispose of toxic waste into the Allen Park clay mine.

This country has a poor record in the area of toxic waste. How many communities in this country have been assured by business and governmental leaders in the past that they didn't need to worry about waste being dumped into nearby land and rivers, only to find out years later that the "experts" had been wrong. These communities now are faced with high rates of cancer and ruined property values, to name only two of the possible catastrophic consequences of dumping toxic waste in close proximity to residential areas.

I do not want myself, my grandchild, my children, my friends and neighbors and future generations exposed to potentially harmful substances simply for the convenience and profit of Ford Motor Company. Until we know for sure what the future outcomes of toxic waste dumping will be and find better means of dealing with the problem, we must take particular care not to dump it into the backyards of human beings.

I—an average citizen—certainly don't have an answer to our toxic waste problems; but I do know that the Ford Motor Company toxic waste plan is irresponsible, and I urge the E.P.A. to prevent this potential tragedy. We pay taxes and place our trust in our public officials to ensure our quality of life, not to "sell our souls to the devil."

Sincerely,

Alwayne Beaver

Mrs. Alwayne Beaver
3325 Dallas
Dearborn MI 48124

December 5, 1988

Mr. Lee M. Thomas, Administrator
Environmental Protection Agency
401 M, S.W.
Washington DC 20460

Ref. MID 980-568-711

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I--an average citizen--certainly don't have an answer to our toxic waste problems; but I do know that the Ford Motor Company toxic waste plan is irresponsible, and I urge the E.P.A. to prevent this potential tragedy. We pay taxes and place our trust in our public officials to ensure our quality of life, not to "sell our souls to the devil."

Sincerely,

88DEC 9 4:15 PM

RECEIVED
Dearborn MI 48125
EPA
CORR. CONTROL
Mrs. Wayne Gear
3325 Dallas
Dearborn MI 48125

Mr. Lee M. Thomas/Administrator 2651 Venice St.
Environmental Protection Agency Dearborn, MI 48124
401 M. S.W.
Washington, DC 20460

12-2-88

RE: MID 980-568-711

Dear Mr. Thomas:

Please cooperate with our Michigan DNR representative in refusing to issue a permit to the Ford Motor Company - which would allow them to dispose of toxic waste at the Allen Park Clay Mine.

We have a nice neighborhood and would like to see it stay that way - and not see even more of our neighbors dying of cancer. This is a normal discussion and has been for a long time - every time someone dies - it is either cancer or lung problems.

We have just learned recently that this same site was used as a hazardous dump site (surprisingly) and was closed in 1986 due to failure to meet requirements of DNR regulations.

In the name of humanity - this disposal is absolutely an outrage....especially only blocks from residential property in 3 communities and two large hospitals - VA Hospital and Oakwood Hospital -Dearborn.MI/ Allen Pk. MI

WE ARE CONFIDENT THAT THIS PERMIT WILL NOT BE ISSUED IF YOU DO YOUR DUTY AS ENVIORNMENTAL PROTECTION REP.

Thank you,
Sincerely,

Gilda Orr

(Mrs) William Orr
2651 Venice St.
Dearborn, MI 48124

Mr. Lee M. Thompson, Director
Environmental Protection Agency
401 M. S. W.
Washington, D.C. 20460

Re: MTR 920-708-714

Dear Mr. Thompson:

I have contacted with the Michigan DNR regarding the
proposals for the proposed to build a canal to
the Ford River Company - which would allow
them to dispose of toxic waste at the site
Lake City, Mich.

I have a wide knowledge and would like to
see it also that day - and not even sure of
any information during the night. The DNR
information and has been for a long time - every
time someone else - it is almost certain on that
point.

We have just received recently that the
site was used as a hazardous waste site
and was closed in 1985 due to failure to meet
requirements of the regulations.

In the name of humanity - this disposal
regulation as a hazardous waste site and
from residential property - common sense and
two more people - we should not allow
this site - Michigan, MI.

It is my hope that this information will be
of use to you in your environmental protection work.

88DEC 9 A10:01

19,048

RECEIVED
EPA
CORR. CONTROL

1710 Culver
Dearborn, Mi. 48124
Dec. 1, 1988

Mr. Lee Thomas
Washington, D.C.

Dear Mr. Thomas:

For the sake of future generations, I vigorously oppose Ford Motor Co.'s proposed toxic waste site at the corner of Oakwood and Southfield. (File number MID 980-568-711). This waste site is far too close to a residential area.

Thanks for your consideration.

Sincerely,
Belva Smith

RECEIVED
EPA
CORR. CONTROL
18990
88DEC 8 47:33

ALLEN PARK CLAY MINE
RE: FILE #MID980-568-711

Outer Dr. Apts. -D5
23935 W. Outer Dr.
Melvindale, Mich.
December 2, 1988

Mr. Lee M. Thomas
Environmental Protection Agcy.
401 M/ S.W.
Washington, D.C. 20460

RE: FILE #MID 980-568-711
ALLEN PARK CLAY MINE

Dear Mr. Thomas:

This letter is being written to call your attention to the problem of issuing a permit to Ford Motor Company (for the disposal of hazardous waste.)

This location is only blocks from three residential areas in Dearborn, Allen Park and Melvindale, MI. There has been many cases of cancer in our neighborhood, according to surveys taken. In 1986, this site was closed due to violations of DNR regulations for hazardous dumping, which surprised many of us.

Please help our Michigan DNR representative do his job, since Michigan showed much concern (in the last election) for environmental problems and waste clean-ups. He certainly should refuse to issue this permit.

In the past, you have always done an excellent job and we know you have the interest of the public on your priority list....FIRST.

Sincerely,

Robert E. St. Onge

Robert E. St. Onge

died or are dying^{now} of cancer). Are they on her list? I think not especially like Mr. Ed Olofson who is dying of unoperable lung cancer who lived across the street from me. He lived there for years and just moved about a year ago to another neighborhood. Lord Jerome Amber would be quick to say it was because of his lifestyle or other environmental factors. Ann Schwartz would say it was his age. BULLSHIT! He was a retired gym TEACHER in great shape for his age and he NEVER smoked cigarettes a day in his life. In fact he was married to a nurse. You know what's ironic, his RETIREMENT home is even closer to the dump ... maybe ~~God~~^{Ford's} will put him out of his misery and let him die faster because he moved closer!

He is not the only horror story. There are more than average #'s of these stories here ... you just aren't talking to the right people. You are talking to people who have some sort of vested interest in concealing our sicknesses.

Plus people seem to be overly childless here. Many, many couples have adopted children. I ask why? TOXINS?

- ③ You say the DNR's Quackenbush says the new permit will probably be issued in the next few weeks. And the MICH. CANCER FOUNDATIONS Ann Schwartz said, "If we do find something they CAN ALWAYS take the LICENSE AWAY." Hogwash Everyone (lawyers, experts, citizen groups, politicians) I hear speak says that once the permit is granted there is nothing we can do. You can not overturn it. All we can do is stop the permit from being granted --- that is our only hope!
- ④ The permit isn't even granted yet and Ford's has ALREADY begun construction on the new area. My husband is there ^{THE DUMPS} mailman and for about a month now he sees them doing all kinds of construction & digging going on there. I have also heard others report the same thing (EX MRS. EILEEN NIEVES 3362 RAYMOND DBN MI 48124)
- ⑤ Ford's claims that they haven't dumped TOXIC WASTE there since 1986 yet every community meeting I attend on this topic people report seeing men in protective clothing dumping stuff in there after 11pm.
- (#1) If it's not toxic why are they wearing special clothing?
- (#2) If it is authorized why are they dumping after 11pm?

(#3) If they haven't been dumping toxins at 17005 Oakwood since 1986, where are they dumping them?

⑥ JERRY AMBER, Ford's chief staff engineer for industrial wastes said that he didn't find it odd as to the numbers of cancers in my area (SNOW WOODS^{DEARBORN'S}) because "cancer is so common among older people". BIRDSEED!!!

I am 32 and have had cancer cells in my uterus for a couple of years and worry if this will effect me having children.

Also Betty Bennett* whom you mention in your ~~Sat~~ Nov 19th article wrote to our Congressmen, Representatives, EPA, DNR mentioning a couple of ^{YOUNG} women she knows of in her neighborhood with the same condition.

Also my one neighbor, Eileen Nieves*, recently told me her daughter (32 yrs old) has the same problem. No health study has been around here -- otherwise the truth would come out. I wouldn't doubt the little children are sick too. I just don't know enough neighbors with kids.

* Both of these women have lists of CANCER & CANCER deaths in their specific neighborhoods in DEARBORN.

We wouldn't mind a toxic landfill in our highly populated neighborhood if every effort

1727 Linden

3362 Raymond

was made to (#1) neutralize the TOXINS FIRST and then (#2) dispose of these toxins in proper containers that can't ~~seep~~ seep AND then store these containers in a building that's totally enclosed so it can't seep into our ground water OR ooze into our air supply! We are drinking and breathing this stuff. It's going through our skin pores.

In Saturdays Detroit News you say that Jerry Amber said "Ford has tried to work with residents, answer their concerns & promised to meet the strictest safety guidelines." Bullshit! I been to the public hearings and landfill meetings and never did this man or another representative of Ford's stand up and answer our concerns! No but Ford representatives AND LAWYERS were there listening to every thing we had to say ... what, to stay one step ahead of us in our pursuits? They were there laughing & joking before the September 15th, 1988 public hearing with Peter Quackenbush of the Michigan DNR.

Are people in high places getting paid off to allow such dumping? It sure appears that that is the only answer.

Ford Motor Company has money. Politicians need money to run campaigns. The DEPARTMENT

of NATURAL RESOURCES and the ENVIRONMENTAL Protection Agency two agencies formed to protect us let such dangerous practices go on all around us. For example, why does Ford Motor Company get to police their own toxic waste facility? Of course they are going to say that they meet the standards. If some poor Ford Motor Co. employee blew the whistle, he would loose his job. Why aren't the people of the effected cities (Dcn., Dcn. Hts., Allen Park, Melvindale, SW. Detroit), their community organizations AGAINST the dump (EX Snow Woods Group) and the Mayors and Independent INDUSTRIAL WASTE EXPERTS along with the EPA & DNR monitoring (testing) the site on a regular basis?

This is a blatant disregard for public concerns. Maybe you, Mr. Mitzelfeld, can hit the right nerve with your articles. My husband, my neighbors and myself are amazed that no one in power that we have contacted has made any effort to do anything. This problem will not simply go away, we can't just shut our eyes. Now that you see some of our concerns, maybe you can delve into them in future articles. God Bless You for bringing our concerns

To print. And thank-you for front page news.

Sincerely,

Debbie Dryer Kimura

P.S. If you need any information of this landfill
BRENDA LIVE OAKS is the woman to contact. She
has researched this matter thoroughly and knows
all about toxic waste. She is the person I
would put on TV if I could choose a community rep.

Copies To...

DBN HEALTH DEPT
MICH CANCER SOCIETY
GOV. J. BLANCHARD
SEN. GEO. HART
SEN. DON RIEGLE JR. (ENVIRONMENT COMMITTEE)
SEN. CARL LEVIN
CONG. WILLIAM RUNCO
[REDACTED] JOHN DINGELL, (U.S. CONGRESSMAN)
PETER QUACKENBUSH (MICH DNR)
DAVID PETROVSKI (U.S. EPA)
KEN BURDA (DNR LANSING)
MAYOR M. GUIDO (DBN)
MAYOR T. COOGAN (MELVINDALE)
TOM DUFFY - SNOW WOODS PRES.
KEN ZIMNICKI - SNOW WOODS DIRECTOR
BETTY & EDWARD BENNETT - CONCERNED CITIZENS DEARBORN
BRENDA LIVE OAKS - CONCERNED CITIZEN DETROIT
DR. TOM SHOENS - DIRECTOR OF TESTING OF AIR TOXINS
WAYNE COUNTY AIR POLLUTION
BILL BONDS - CHANNEL 7 WAYZ TV ANCHOR PERSON
ANN BASSIO - CONCERNED CITIZEN DEARBORN
CURTIS MCGUIRE - CONCERNED CITIZEN ALLEN PARK
VICTOR & VIOLET FLOWERS - CONCERNED CITIZEN ALLEN PARK
ANN SCHWARTZ - MICHIGAN CANCER FOUNDATION - CHIEF OF EPIDEMIOLOGY UNIT
LEE M. THOMAS (EPA - WASHINGTON DC)

of
S.W. DETROIT

RECEIVED
OCT 28 1988

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RECEIVED
OCT 31 1988

WMD-OR-REB
EPA, REGION V

Edward R. Jersmer
17932 Harman St.
Melvindale, Michigan
48122 388-4552

OCT/25/1988

David Petrovski:

In response to E.P.A. file number
MID 980-568-711. Subject: Ford Motor Company
allen park Clay Mine + Hazardous Waste Landfill.

I am strongly opposed to the
continuing use of this site and have never
been made aware till now the dangers
that exist with its presence.

Being a taxpayer, father of one
child and a member of two City of
Melvindale Commissions I am
appalled that this situation has
been allowed to exist.

We in the Jersmer family have
experienced clouds of dust and leaves
watered down muck before storms
with wisterky winds. The muck is
left by trucks entering and leaving
the site and when you drive by
it gets all over the car and carried
home where it is washed off by one

of the family members. We all have been exposed either by airborne particles or by simply touch when washing the car. The shame is I don't even know what I've been contaminated with or my family.

I am scared for my family my property and my city.

Do not allow this nightmare to continue. Please oppose any further operations to exist at this site. And request an investigation and cleanup of this site in one of the most densely populated areas of Michigan.

Thank you

Voter and Taxpayer
Edward L. Sessmer

1501 Hollywood
Dearborn, Mi. 48124
Oct. 25, 1988

DAVID PETROVSKI
U.S. ENVIRONMENTAL PROTECTION AGENCY
5 H S-13
230 S. DEARBORN
CHICAGO, IL. 60604

RECEIVED
OCT 27 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RE; EPA FILE NUMBER MID 980-568-711

TO WHOM IT MAY CONCERN;

I am writing to express my deep concern about the dumping of hazardous and toxic waste by the FORD MOTOR COMPANY at their ALLEN PARK CLAY MINE. It is to be dumped in open pits, and particles of toxic dust could be blown all over the residential areas very near the dumping grounds. Also, there is always the danger of residue seeping into our water supply. I work outside in my yard very often--winter and summer, and I resent the fact that the air I breathe could be contaminated with this waste. There are times when the odor from this dump (at the present time) travels a long distance, and, now, they want to add to this problem by dumping toxic and hazardous waste matter also.

CONCERNED CITIZEN

LeVelle M. Hearsh,
Homeowner.

WALTER + JOAN KORCZYK
1920 HOLLYWOOD ST
DEARBORN MICHIGAN 48124

David Petrovski
US Environmental Protection Agency
5H S-13
230 S. Dearborn
Chicago Ill. 60604

RECEIVED

OCT 21 1988

WMD-OF-REB
EPA, REGION V

Dear Mr Petrovski

Please help us and our neighbors
stop the Ford Motor Company hazardous
waste landfill EPA FILE NO. MID-980-568-711
of the toxic waste that they are dumping
in our neighborhood. Please do everything
you can to stop this from happening
to our now beautiful quiet safe
neighborhood for all our futures sake

Thankyou
Walter and Joan Korczyk

PS.

This sight will effect homes in all 3 cities
of Dearborn, Melvindale, and Allen Park.

RECEIVED

OCT 21 1988

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

October 20, 1988

RECEIVED
OCT 24 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

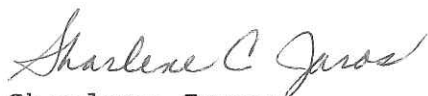
David Petrovski
U.S. Environmental Protection Agency
5H S-13
230 S. Dearborn
Chicago, Illinois 60604

Subject: Ford Motor Company Allen Park Clay Mine Hazardous Waste
Landfill - EPA File Number MID 980-568-711

My family and I have lived in the Snow Woods neighborhood of Dearborn for 12 years. We spent over a year finding just the right neighborhood to move our family to. For 12 years we thought we had found it. Now we fear that our health and safety might be threatened.

We ask that the permit for the landfill be denied, at least until such time as an intensive study should be made regarding the safety of this project. How safe will this area be 10, 20 or 50 years from now? Please, take the time to find out before the permit is granted.

Thank you,



Sharlene Jaros
3315 Houston
Dearborn, Michigan 48124

October 19, 1988

Dear Sir,

As a Dearborn resident and Ford Motor Company employee in car styling, I have much to be proud of. However, this pride is being shaken over concerns of the Ford Motor Company Allen Park Clay Mine Hazardous Waste Landfill. (EPA File number MID 980-568-711). This landfill is admittedly a Toxic Waste Landfill which is close to residential communities and the Rouge River basin.

After speaking to Mr. Amber at Ford Environmental, I was still not satisfied with the landfill's effectiveness as being safe. Since this is a residential area we must also be concerned with the potential loss of property value on a large scale. One must wonder if the proponents of this project would still be in favor if they lived where I do.

Surrounding community leaders support my concerns, so in that regard I request any assistance that you may give in convincing the Michigan DNR to refuse permission to Ford Motor Company for dumping Toxic Waste.

Sincerely,

Paul S Bailey

1727 Linden
Dearborn Mich. 48122
September 20, 1988

Peter Quackenbush
Waste Management Division
Lansing, Mich. 48909

EPA File No Mid 980-568-711

Dear Mr. Quackenbush,

I mailed the letter (copy enclosed) on Saturday, Sept. 17 so it would be postmarked that day. Also wanted our protest registered with the rest of people listed, hoping someone on that list will listen with their hearts and help us close that dump. To many of us, breathing and eating that foul air and pollutants for all these years we feel we don't have a chance. It really isn't fair and to think they tried to sneak that relicensing hearing through so no one would know. Please think how you'd feel, Mr. Quackenbush, if that mess was two blocks from your home. Don't give them the permit. Thank you.

Sincerely,

Betty and Edward Bennett

RECEIVED

SEP 22 1988

Waste Management
Division

Dearborn, Mich. 4816
Sept. 17, 1988

Mr. Ken Burda
L.N.R.
Lansing, Mich. 48909

Dear Sir,

When I spoke at the meeting on September 13 in Allen Park, I gave you some figures of cancer cases in one block of 25 houses. As stated at that time I was not prepared to speak, but since no one else addressed that particular problem, I felt it was imperative that the information I have be stated publicly. I have compiled a list of names and addresses in that block of 25 homes plus some others you might be interested in. I am also listing the type of cancer if known to me. If sir, you will stop and think of your own neighborhood, do you or any of your people have this much cancer where you live? We've lived here 35 years, raised 4 daughters here. Our 33 year old had cancer cells present in the uterus. Next door, the 33 yr. old daughter, raised here, uterine cancer cells. They both have small children - must be watched carefully. Think.

If as you say they've sealed off toxic cell[#] then why are dump trucks going in there at two

and three a.m. with drivers wearing masks. What are they dumping that late - they don't want anyone to see? The agreement with Ford was "no dumping after 11 p.m." so we could sleep.

If you were in my shoes, I have no doubt, you'd be breaking down doors getting this stopped. Just stopping the toxic waste won't do it. Closing the dump completely is what's needed. As you can see they can sneak in when everyone's sleeping. The policemen who spotted this were not sleeping.

We are walking time bombs. This is going to be an even larger "Love Canal" than the original. We must learn from others mistakes as well as our own. Please do not issue the permit for relicensing.

Sincerely,

Betty and Edward Bennett

David Petrovski U.S.E.P.A.

Letters (Copy) to:
Labn. Health Dept.
Mich. Cancer Society
Gov. James Blanchard
Sen. Geo. Hart
Sen. Don Riegle Jr.
Sen. Carl Levin
Cong. Agnes Dobronski
John Dingell, Sen.
Peter Quackenbush M.D.R.

Irv. Heaton 1660 Southfield, Kidney LIVING
 Walter Piendel 1674 Southfield Deceased
 John Butsch 1674 Walnut Pancreas II
 Corey Nanninga 1701 Walnut Lung L
 Robert Retz 1713 Walnut Liver II
 Name unknown 1712 Walnut II
 Thomas Dolan 1917 Walnut II
 Marlene Sankar - Southfield Brain L
 Elmer Dietrich Sherwood Ct. 1689 Lung
 Mrs. Ryan 1666 Southfield II
 Barbara Ohey - Walnut II
 Dorothy Peterson uterine & colon 1806 Linden L
 Mr. Crowley 1816 Linden colon II
 Fay Hutchens 1826 Linden Mastectomy L
 Josephine Barkowski 1836 Linden Mastectomy L
 George Simon 1846 Linden rectal II
 Lunda Cannsonetta 1927 Linden II
 Ella Cole ? Linden skin L
 Arthur Scala 1845 Linden Liver II
 Ray Jones 1825 Linden lung + brain II
 Esther Cullen ? Linden Bone L
 Frank Konrad 1761 Linden II
 Leon St. John Linden II
 Phyllis Hronkiewicz 1755 Linden II
 Sandra Dietzler Snow Rd at Linden L
 Barbara Sommers Snow Rd " Linden Kidney removed 25 yrs old
 Charles Balagna Christine Ct. Lung II
 Lillian Livingston 1781 Sherwood Ct. Breast cancer II
 Virginia Munday 1705 Birchcrest - leg to pancreas to lung II
 Harry Sarkisian 1655 Birchcrest Brain II

5 homes in a row

Sonia Rokowski 1648 Birchcrest breast & femal organs - in commission L
Dorothy Theobald 1666 Birchcrest II
Howard Kepler 1678 Birchcrest Lung L
Matt Zippel 1706 Birchcrest L. Type unknown
Marg Adams 1716 Birchcrest Lung - presently in last stages



Rouge River Watershed Council

300 FAIR LANE DRIVE SUITE 3 • DEARBORN, MI 48128
TELEPHONE: (313) 271-4540

September 20, 1988

Peter Quackenbush
Michigan Department of Natural Resources
Waste Management Division
P.O. Box 30038
Ottawa Street Building - South Tower
Lansing, MI 48909

re: Ford Motor Company Allen Park Clay Mine Hazardous Waste Landfill
EPA File # MID 980-568-711

Dear Mr. Quackenbush:

Will you please send the Rouge River Watershed Council copies of the following pieces of information from the Ford Motor Company Allen Park Clay Mine Hazardous Waste Landfill:

- * the current permit
- * the permit application
- * a list of all the constituents in the landfill
- * the surface water quality test results from 1980 to the present
- * the ground water quality test results from 1980 to the present

Also, will you please send us a copy of your final decision regarding the permit application when it is made? Thank-you.

Sincerely,

Jayne Allen, Water Resource Specialist
Rouge River Watershed Council

RECEIVED

SEP 22 1988

Waste Management
Division

1727 Linden
Dearborn Mich. 48124
September 20, 1988

Mr. David Petrovski
U.S. Environmental Protection Agency
230 S. Dearborn
Chicago, Ill. 60604

RECEIVED
SEP 23 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Mr. Petrovski

I am enclosing a copy of a letter about the Ford toxic dump (EPA File Number Mid 980-568-711) in Allen Park, Michigan. My letter to Mr. Burda was in the mail Sat. Sept. 17. but I did want to go on record with the U.S. E.P.A. as protesting the relicensing of that dump - toxic or otherwise. A company with the name Ford and the reputation it carries should be shamed. They are putting the lives of everyone anywhere near there in danger.

Please do not issue a permit to relicense. It's killing us.

Sincerely,

Betty & Edward Bennett

1727 Linden
Dearborn, Mich. 48124
Sept. 17, 1988

Mr. Ken Burda
D. N. R.
Lansing, Mich. 48909

Dear Sir,

When I spoke at the meeting on September 13 in Allen Park, I gave you some figures of cancer cases in one block of 25 houses. As stated at that time I was not prepared to speak, but since no one else addressed that particular problem, I felt it was imperative that the information I have be stated publicly. I have compiled a list of names and addresses in that block of 25 homes plus some others you might be interested in. I am also listing the type of cancer if known to me. If sir, you will stop and think of your own neighborhood, do you or any of your people have this much cancer where you live? We've lived here 35 years, raised 4 daughters here. Our 33 year old had cancer cells present in the uterus. Next door, the 33 yr. old daughter, raised here, uterine cancer cells. They both have small children - must be watched carefully. Think.

If as you say they've sealed off toxic cell #1 then why are dump trucks going in there at two

and three a.m. with drivers wearing masks. What are they dumping that late - they don't want anyone to see? The agreement with Fords was "no dumping after 11 p.m." so we could sleep.

If you were in my shoes, I have no doubt, you'd be breaking down doors getting this stopped. Just stopping the toxic waste won't do it. Closing the dump completely is what's needed. As you can see they can sneak in when everyone's sleeping. The policemen who spotted this were not sleeping.

We are walking time bombs. This is going to be an even larger "Love Canal" than the original. We must learn from others mistakes as well as our own. Please do not issue the permit for relicensing.

Sincerely,

Betty and Edward Bennett

David Petrovski U.S.E.P.A.

Letters (Copy) to:
Dhn. Health Dept.
Mich. Cancer Society
Gov. James Blanchard
Sen. Geo. Hart
Sen. Don Riegle Jr.
Sen. Carl Levin
Rep. Agnes Dobronski
John Dingell, Sen.
Peter Quackenbush M.D.R.

Irv. Heaton 1660 Southfield, Kidney LIVING
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 Elmer Dietrich Sherwood Ct. 1689 Lung
 Mrs. Ryan 1666 Southfield II
 Barbara Ohey - Walnut II
 Dorothy Peterson Uterine and colon 1806 Linden L.
 Mr. Crowley 1816 Linden colon II
 Fay Hutchens 1826 Linden Mastectomy L
 Josephine Barkowski 1836 Linden Mastectomy L
 George Simon 1846 Linden rectal II
 Shunda Cannsonetta 1927 Linden II
 Ella Cole ? Linden skin L
 Arthur Scala 1845 Linden Liver II
 Ray Jones 1825 Linden lung + brain II
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 Leon St. John Linden II
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5 homes in a row

Sonia Rokowski 1648 Birchcrest breast & femal organs - in remission L
Dorothy Theobald 1666 Birchcrest II
Howard Kepler 1678 Birchcrest Lung L
Matt Zipple 1706 Birchcrest L. Type UNKNOWN
Marg Adams 1716 Birchcrest Lung - presently in last stages

OFFICE OF THE MAYOR
GERALD N. RICHARDS

City of Allen Park

16850 SOUTHFIELD ROAD
ALLEN PARK, MICHIGAN 48101
PHONE: 928-1400



September 19, 1988

David F. Hales, Director
Department of Natural Resources
Stevens T. Mason Building
Box 30028
Lansing, MI 48909

RECEIVED

SEP 22 1988

Re: Ford's Allen Park Clay Mine
Hazardous Waste Landfill

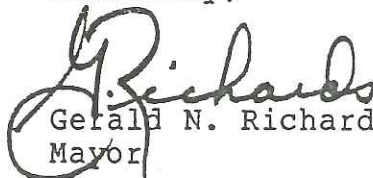
Waste Management
Division

Gentlemen:

At the meeting held in the Allen Park City Hall on September 15, 1988, the Chairman indicated that he would leave the record open for comments received this week. Therefore, consistent with our City spokesman's position, I personally advise you that the Ford hazardous waste permit must be denied until the issues and questions raised by the City of Allen Park are resolved to the City's satisfaction.

Further, from my personal observations, it appears that a meaningful dialog with the municipalities and the public have not been achieved. I believe that the only way that this process will be achieved is to acquiesce with the City's request that we be allowed to review the public response summary and make any additional comments which are required for the protection of our citizens.

Sincerely,


Gerald N. Richards
Mayor

cc: Peter Quackenbush, Environmental Engineer

RECEIVED

SEP 19 1988

Waste Management
Division

1727 Linden
Dearborn, Mich. 4812
Sept. 17, 1988

EPA FILE NO. Mid 980-568-711

Dear Mr. Burda,

I am addressing this to you as chairperson of the recent meeting on September 13 in Allen Park. I gave you some figures on cancer cases in one block of 25 houses. 14! As stated at that time, I was not prepared to speak, but since no one else addressed that particular problem, I felt it was imperative that the information I have be stated publicly. So, I have compiled a list of names and addresses in the 25 house block plus some others you might be interested in. I am also listing type of cancer if known to me and a D if deceased & L if living. If sir you will stop & think of your own neighborhood - do you or any of your fellow workers have that much cancer ~~where~~ you live? We have lived here 35 years, raising four daughters - one of which has uterine cancer cells (33 yrs old). Next door to me daughter raised here - same age - uterine cancer cells. Both girls being carefully watched, both with small children. A young lady, Barbara Sommers, 25, on Snow road - removal of cancerous kidney. A young lady on Walnut first block off Oakwood - brain cancer.

If as you say, they have sold time cell #1 then

why are these "making" into that dump site at

that 3:30 a.m. with these wearing masks. What are

they dumping in there when it was intended the

dump would close down at 11 p.m. as people could

sleep. And if you were in my shoes, I have no

doubt you'd be treating down there getting the

stopped. Just stopping dumping toxic waste isn't as

it. Closing the dump completely is what must - they

seem able to make an action out of them - as they

could also make toxic. A policeman witnessed the

medical device incident.

The are working time bombs and the are

is going to be a bigger "Fox Canal" than the original.

The must learn from our mistakes.

Please do not permit the poisoning of the

ump.

Sincerely,

Betty J. Bennett

Names of cancer cases known to me

- Marlene Sankar - Southfield Brain L
- Irvin Heaton 1660 Southfield Kidney L
- Kalter Piendel 1674 Southfield II
- John Butsch 1674 Walnut Pancreatic II
- Carey Nanninga 1701 Walnut Lung L
- Robert Retz 1713 Walnut Liver D
- Name unknown 1712 Walnut II
- Mrs. Ryan 1666 Southfield II
- Barbara Abey Walnut II
- Dorothy Peterson 1806 Linden Uterine & Colon L
- ? Crowley 1816 Linden Colon D
- Fay Hutchens 1826 Linden Mastectomy L
- Josephine Barkowski 1836 Linden Mastectomy L
- George Simon 1846 Linden rectal II
- Sunda C
- Ella Cole Linden skin L
- Arthur Scala 1845 Linden LIVER II
- Ray Jones 1825 Linden LUNG & BRAIN II
- Esther Cullen 1805 Linden
- Frank Konrad 1761 Linden II
- Leon St. James 1805 Linden II
- Phyllis Kronkowitz 1755 Linden lymph II
- Virginia Munday 1705 Birchcrest - lig to pancreas to lung II
- Charles Bologna Christine Court Lung
- Lillian Livingston 1781 Sherwood Ct. Breast cancer II
- Harry Sarkisian 1655 Birchcrest Brain D.
- Stonia Rakowski 1648 Birchcrest - Breast - female organs L.

5 homes in a row

Dorothy Theobald 1666 Birchcrest II
Howard Kepler 1678 Birchcrest Lung L.
Matt Zipple 1706 Birchcrest (type unknown) L
Marg Adams 1716 Birchcrest Lung - in last stages

Mr. & Mrs. Norman D. Jagger
1676 Linden
Dearborn, MI 48124
September 17, 1988

RECEIVED

SEP 19 1988

Waste Management
Division

Peter Quackenbush
Michigan Department of Natural Resources
Waste Management Division
P.O. Box 30038
Ottawa Street Building - South Tower
Lansing, MI 48909

Attention: Peter Quackenbush

Regarding: EPA File Number MID 980-363-711

We attended a public concerns meeting regarding the FORD MOTOR COMPANY ALLEN PARK CLAY MINE HAZARDOUS WASTE LANDFILL on Thursday, September 15 at the Allen Park Civic Center.

That meeting, attended by 300-400 people, begun at approximately 7:15 p.m. did not break up until 11:30 p.m.

As we were returning home at the intersection of Southfield and Oakwood our car filled with strong offensive odors. Just two blocks from that intersection, just two blocks from the landfill, in our home the windows had to be kept closed because of strong offensive odors. It is not unusual to get up during a summer night finding it necessary to close all windows because of strong offensive odors.

Now there is soot on the windowsills. It is routine to wash all windowsills after rain because of grime left behind. Black grime is routine in housecleaning water reenforced with Clorox, dust cloths, clothes hung out to dry, driveways, freshly fallen snow, etc.

I drove the entire perimeter of the landfill on Friday, September 16 looking for posted hazardous waste/toxic landfill signs. The only posted signs are those stating warnings of danger to unauthorized personnel.

The verbal quotations by residents of Snow Woods of neighborhood cancer incidents is astounding. We suggest it is reasonable to assume similar figures could be discovered in Melvindale, Allen Park, and Detroit along the residential boundaries of the landfill.

At the meeting people's concerns were aired:

- children have entered the forbidden territory.
- what kind of water is in capped wells.
- young adults played in the area as young children.
- high cancer incidence needs indepth research.
- what about planned water use for Ford golf course.
- what is in the air we are breathing.
- home furnishings are filthy/destroyed by foul air.
- lack of information to local officials and residents.
- location of hazardous/toxic waste in residential neighborhood.
- potential collapse into underground salt mines.
- unknown pollutants dumped before regulations were in effect.
- MDNR/EPA/FMC indifference for local residents health and property.
- MDNR/EPA/FMC indifference for potential concerns of Veterans

Administration and Oakwood Hospitals.

- lack of personal knowledge that the hazardous/toxic waste dump exists.
- create a bubble over the entire landfill area.
- another adequately publicized meeting could bring out 3,400 concerned residents.
- violations of regulation, need for new regulations.
- 3:00 a.m. dumpings by people wearing hoods.

At the meeting citizens as well as officials implorred the MDNR/EPA representatives to conduct more research, seriously consider their concerns, and say "NO" to Ford Motor Company.

The resounding message by the citizens was "NO MORE".

It is our supportive opinion that the citizens have good sound reason to beg the MDNR/EPA to conduct more research, to correct existing conditions potentially harmful to humanity, and to ultimately say "NO" to Ford Motor Company.

Sincerely,


Mr. & Mrs. Norman D. Jagger

Sept 17, 1988

Mr. Peter Quackenbush
Mich. Dept of Natural Resources
Lansing, Mi 48909

Dear Mr. Quackenbush,

I would like to register my objection to permitting Ford Motor Co. obtain relicensing of its hazardous waste landfill in Allen Park.

They made also be seeking a DNR waiver allowing them to stop groundwater monitoring at this site.

Please examine this claim carefully and uphold your order of 1985 which stopped hazardous waste storage in this area and insist that groundwater monitoring be continued.

Thank you for all the excellent work done by the Mich. DNR to keep our state clean.

Sincerely

Mary Hurlocker
22732 W. Outer Dr.
Dearborn, Mi 48124

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SEP 19 1988

Waste Management
Division

September 16, 1988

RECEIVED
SEP 19 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

David Petrovski
U.S. Environmental Protection Agency
5H S-13
230 S. Dearborn
Chicago, IL 60604

I am writing in protest of the Ford Motor Company Clay Mine Hazardous Waste Landfill - EPA File #MID 980-568-711.

I have lived in this community for several years. I like the community and wish to stay for several more years.

I am extremely concerned with the thought of additional hazardous chemicals being stored in such a populated area. Over the last several years the news media has released stories of dangerous seepage from such chemicals, a higher rate of cancer possibly being caused by same, and a higher percentage of birth defects.

This area is populated in large by young families. Families with small children, women of child bearing years. These small children and the children to come are the future of this country. I want to see that they get a chance at life too. A life as free of cancer and birth defects as possible. It's a sad sight to watch a child die or lose their chances at a normal, healthy, happy life.

I don't feel we, as a scientific nation, have enough knowledge in the area of chemical waste storage to be possibly endangering so many lives.

Sincerely,

Jeffrey A. Janthos
8958 FOX
ALLEN PMI 48101

2652 Venice St.
Dearborn, MI 48124
September 14, 1988

RECEIVED
SEP 21 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA REGION V

RE: EPA FILE # MID 980-568-911

Dear Sirs:

This letter is being sent to your department in the hope that it will add one more protest to the hazardous dumping in our area, by the Ford Motor Company, at the Clay Mine on corner of Southfield Rds. and Oakwood Blvd., (Dearborn, Press) (Allen Pk., MI.) Our city newspaper carried an article informing people that the Snow Woods Association has requested a second hearing on this matter. Since I will not be able to attend, since I am presently ill with Asthma and Emphysema and seldom attend gatherings because of the smoking (and very susceptible to germs.) However, I wish to inform the DNR of the number of Cancer deaths in our immediate block. (Also Lung problems- which is cause of my husband's death, May 1987, & who was concerned about dumping.)

As follows: (Within last eight years)- list of Cancer deaths:

- Venice St. - Ruth Buchanan - formerly 2661 Venice St. (Lung cancer)
(near Ash St) (surviving spouse living in Dbn.)
- Betty Laird - formerly 2623 Venice St. (Lung cancer)
(surviving sons - Downriver Area)
- John Beanblossom - 2643 Venice St. (Lung cancer)-1986
- *- Wife at 3116 Venice - (Cancer)- 1987 (Husband survives)
- *****
- Frieda Darwish - 2636 Venice St. - Operated Successfully
(Chemo-therapy -Cancer)
- Croissant -3211
(Near Ash St)
- Wife -Adeline Bryant- Cancer-1985.
(Surviving son - same ads.)
- (Near Ash St) - TOM MARSE (CANCER OF BRAIN - Being tried in TEX.)
- Hollywood St. - 2661 Wife died of cancer (1986)
- " " - 2651 Husband died of cancer (1982)
- " " - 3105 Husband died of cancer (1986)

PLEASE DO NOT ALLOW HAZARDOUS WASTE TO BE DUMPED AT CLAY MINE -
BY FORD MOTOR COMPANY OR ANY COMPANY.

Thanking you,

Anne M. St. Onge
(M. Anne St. Onge)

New hearing planned on Ford landfill

By CHERYL EBERWEIN
Staff Writer

Ford Motor Co. acquiesced to resident demands last week and scheduled a second public hearing to discuss re-licensing of its hazardous waste landfill in Allen Park.

Residents in Dearborn's Snow Woods neighborhood, which backs up to the landfill, were particularly vocal in requesting a second meeting, telling state, federal and Ford officials that they had not been sufficiently informed about the first hearing held in Allen Park on Aug. 25.

THE HEARING WILL be held Sept. 15 at 7 p.m. at Allen Park City Hall, 16850 Southfield. The Michigan Department of Natural Resources and the Environmental Protection Agency will take resident comments at the session.

Ford is seeking re-licensing of the 260-acre Allen Park Clay Mine for hazardous waste disposal. About 17 acres of the site have been slated for hazardous waste storage; nine acres are now being used for non-hazardous waste disposal. The landfill is located between I-94 and the Southfield Freeway along Oakwood Boulevard.

The landfill has been licensed since 1982 to accept a variety of heavy metals, including cadmium, chrome, lead, selenium and silver. Although the company discontinued hazardous waste storage at the site in 1985, under order from the DNR, it still dumps non-hazardous furnace dust and power house fly ash at the facility.

UNDER ITS CURRENT permit application, the automaker seeks to open a second 11-acre hazardous waste cell that would be ready for use by 1990. The company is also seeking to expand the number of hazardous compounds it can store in the landfill.

Residents in Melvindale, Allen Park and Dearborn raised several health-related concerns at the first public hearing. They cited a 1982 Michigan Cancer Foundation study that found that the incidence of brain and liver cancer among Snow Woods area residents was three times higher than in the rest of Wayne County. Brain cancer is considered rare and one cause is thought to be exposure to heavy metals.

The study found that the overall cancer rate in Snow Woods was similar to the rest of the county, leading the Cancer Foundation to conclude that "there is insufficient evidence to conclude that the residents of the Snow Woods neighborhood are at higher risk of cancer."

ALTHOUGH SYMPATHIZING with resident concerns, Dr. Paul Chapman, retiring head of Dearborn's Health Department, said the foundation study was inconclusive.

"This was a limited study in the first place," Chapman said this week. "When you go into a community and analyze what is going on, you need a way to get data. They couldn't obtain personal histories and family data because most of these people were already dead."

"This study was just a preliminary, preliminary, preliminary study. I thought the variations (in cancer rates) were very minor. You just can't make conclusions from the information that was gathered."

CHAPMAN SAID the foundation agreed to conduct a cancer study in Snow Woods in response to residents' concerns about the health problems associated with the dump. But he said the foundation did not find sufficient cause for doing further in-depth studies once the first was complete.

"The Michigan Cancer Foundation did the best it could with limited resources, but it did not find enough there to look into the matter further," Chapman said.

"Everybody is fearful about the unknown, everybody wants to live forever, no one wants to die. I sympathize with these people . . . but, my impression, having seen it first-hand, is that as landfills go, this one is one of the very best dump sites anywhere."

CHAPMAN SPECIFICALLY cited the landfill's clay soils and artesian groundwater system as valuable in preventing harmful effluents from seeping out of the landfill and into the ground. Water pressure from the artesian system forces groundwater toward the surface throughout this area.

Ford officials also cited the geologic features of the area in defending its permit application. Ford officials said they would seek a DNR waiver allowing them to drop groundwater monitoring at the landfill because "no matter what you find in the groundwater, you can't say it's coming from the landfill because of the upward pressure," according to Ford environmental engineer David Miller.

Written correspondence sent to the DNR by Sept. 17 will be taken into account when making a permit decision, a DNR spokeswoman said. DNR officials added, however, that it was unlikely they would deny Ford a license based on resident concerns.

Village Ford



MICHAEL A. GUIDO
MAYOR

CITY OF DEARBORN

Home Town of Henry Ford

DEPARTMENT OF PUBLIC WORKS

NORMAND G. GOMOLAK
DIRECTOR
DEAN J. ELWART
DEPUTY DIRECTOR
JOHN R. LANCE
ASSISTANT DIRECTOR

September 2, 1988

David Petrovski
U.S. Environmental Protection Agency
5H S-13
230 S. Dearborn
Chicago, IL 60604

RECEIVED
SEP 3 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION 7

RE: Ford Clay Mine at Oakwood and I-94, Allen Park, Michigan

Dear Mr. Petrovski:

Licensure of the waste site should not be continued until the surrounding communities, including Dearborn, are ensured of its operational safety.

Having attended the meeting on August 25, 1988 (at the Allen Park Council Chambers) and noting an absence of information regarding the hazardous waste contents effect on nearby residents, I request such an impact statement.

Examples:

- 7ed
1. What known effect would the suspended waste particles have on the skin, lungs, blood, brain (long and short term; chronic effects)?
 2. What effects are expected on the aquifer?
 3. What effects are expected on the Detroit and/or Rouge Rivers?
 4. What effects can be expected should the mine cells be flooded and leachate spills over?

Please respond as soon as possible.

Thankyou,

N. G. Gomolak
Normand G. Gomolak, Director
Department of Public Works

cc: Mayor
Mark Guido
Joseph Wisk
Legal

/jam

Eleanor D. Brown
1554 Hollywood
Dearborn, Mi 48124
Sept. 1, 1988

U. S. Environmental Protection Agency

5H5-13

230 South Dearborn
Chicago, Ill. 60604

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SEP 1 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Subject: Ford Motor Company
allen Park Clay Mine
Hazardous Waste Landfill
MI D 980568711
RCRA (HSWA) PERMIT COMMENTS

Dear Mr. David Petrowski:

My husband and I attended the
Open Hearing concerning above subject
on August 25, 1988 in Allen Park, Mi.
We strongly oppose the renewal and
additional hazardous waste metals
dumped into the mine so close to our
home.

We live within walking distance to this
dumpsite. How dare the government
and or the Ford Motor Company destroy
and contaminate the air we breathe.

My husband has had two serious heart attacks so he certainly does not need infected lungs from polluted air near our house.

Sometimes I have awakened at night with my chest (lungs) burning inside. I do not leave my windows open at night. The night air is too damp and heavy. We have a newer furnace with an electronic air filter. Therefore I do not appreciate anyone who fouls up our air. I need clean air. I have called the E.P.A. concerning the air problems at night, not realizing the Allen Park Clay Mine was so awful.

My mother who lived in our area and two neighbors in our block have died of cancer in the past 5 years. That is food for thought.

The quality of our air in this area is no longer as fresh as it once was. The trees can no longer purify the misuse.

Please stop for our future generations.
Sincerely,

Mrs. Eleanor L. Brown

P.S. HAVE ANOTHER HEARING!

Mr. David Petrowski,

I am sending you a copy of a letter I wrote to Mr. Jim Mitzelfeld of the Detroit News. It deals with some issues I raise in regards to the TOXIC landfill in Allen Park which effects many communities.

After seeing my concerns, I hope you can appreciate how an overage citizen effected by this situation feels (i.e. scared). I am hoping that you come to the same conclusions and then use the power of your position to influence that the new permit isn't granted and the previous toxic waste dumped in the landfill be excavated and neutralized and / or safely disposed of.

Please Help Us,

Mrs. Debbie Dryjer Kuria

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SEP - 2 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

1727 Linden
Dearborn
Mich. 48124
Aug 29, 1988

To U.S.E.P.A.

Dear Sirs.

We are becoming more concerned and definitely alarmed by the Ford Motor Co. application for relicensing and enlarging their toxic landfill at Southfield and Oakwood Blvd. in Allen Park. They want to add more toxic materials to their list - just two being Arsenic and phenal.

On Thursday, Aug 25, an article appeared in the Dearborn Press and Guide, stating there would be a hearing in Allen Park that evening at 7:30 by the M.D.N.R. and U.S.E.P.A. Upon questioning the reporter, I found she just happened onto news of the hearing from some one out of our

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SEP 28 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Ruth Osinski
15850 Horger
Allen Park, MI 48101
(313) 928-9320

David Petrovski

U.S. Environmental Protection Agency Sept. 18, 1988

5H-513

230 S. Dearborn

Chicago, Ill. 60604

Dear Mr. Petrovski

I attended a meeting on
Sept. 15, 1988 at the Allen Park
City Hall. Subject: Ford Motor
Company Allen Park Clay Mine
Hazardous waste Landfill.

And just like many others
I did not know what was
happening at this site, until
I recieved a flyer in my mail.
And let me tell you when
I left that meeting, I was
scared to death. I could not
believe something like this could
happen so close to so many
people.

expect us to live.

I know the E.P.A. can not be that cold hearted.

Ford Motor has the money to put this dump somewhere else. Put it somewhere that no one will or can not be hurt anymore.

Please! don't let the name Ford Motor and the money they have influence your decision on this permit.

You can not be that cruel! You can't just sit back and let these people suffer. You must have some compassion for us. So help us now we must close this facility down.

You know Fords has posted signs on the fence surrounding the Clay mine.

The signs reads as followed:

Caution

No Trespassing
Violators will be Prosecuted

It's ironic that Fords would place a sign like this. Because as the sign states (Caution) means to warn against danger. So right there we know the site is in fact dangerous. (Trespass) to invade property or invade the rights of another.

I feel Fords did both. They invaded the properties of all the community surrounding the site. How? by letting dust escape from the site in which it could contain a number of harmful chemicals and/or heavy metals and falling in the yards of all these homes, I say that's trespassing. They also invaded the rights of all us people. Why? Because we have the right to live and to be able to breathe fresh clean air. Fords committed an offense and if anyone could

be prosecuted, it should be them. For violating all the lives surrounding this site and also for all the innocent people who lost their lives!

Please don't give them the permit. But help us close this site down.

Don't just throw this letter away we must take action now.

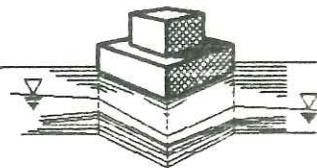
If you do have any feelings you will base your decision on the lives of all us people and not ~~the~~ all the money Ford has.

"Please Help"!!

Thank you
Yours truly
Ruth Osinski

GeoDynamics Consultants, Inc.

5043 Whitlow Court
Union Lake, Michigan 48065
(313) 363-4529



September 17, 1988

Waste Management Division
Department of Natural Resources
Attn: Act 64, Permit Review (Ford Allen Park Clay Mine)
PO Box 30028
Lansing, Michigan 48909

Re: Ford Clay Mine Hazardous Waste Landfill

DNR Permit Review Staff:

This letter presents comments resulting from a brief engineering review of documents associated with the referenced permit application and serves as an adjunct to oral comments presented at the public hearing held on September 15, 1988. The review has been performed at the request of Mr. L. Coogan, representing the City of Melvindale, Michigan.

In addition to specific comments relating to the engineering aspects of the project, additional remarks, later in this text, address the perceived lack of cooperative dialog between the applicant(s), DNR, EPA and the communities affected by the proposed facility and suggest means by which specific concerns of the communities may be addressed.

As noted above, the engineering review of available information has been necessarily brief due, apparently to delays in providing information to the requesting parties. Therefore, there must be an introductory caveat or disclaimer to the effect that the data reviewed may not reflect the sum total of all the available documentation relevant to the permit application and the overall site and that there was insufficient time to fully review all of the information prior to closure of the "public comments" segment of the permit process.

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SEP 22 1988

Waste Management
Division

The documents reviewed are:

1. Liner Engineering Report
Ford Motor Company
Allen Park Clay Mine
Mid 980568711
Section D
Prepared by:
Neyer Tiseo & Hindo, Ltd. {NTH}
March, 1988
Revised June 24, 1988
2. Construction Quality Assurance Plan
Ford Motor Company
Allen Park Clay Mine
Cell II
Mid 980568711
Prepared by:
Neyer Tiseo & Hindo, Ltd. {NTH}
January, 1988
Revised June 1988
3. NTH Letter Report dtd March 29, 1985
Addressed to Mr. David S. Miller
Mining Properties Dept
Rouge Steel Company
Dearborn, Michigan
Re: Vertical Hydraulic Gradients
Allen Park Clay Mine Landfill
4. Hydrogeological Study
Allen Park Clay Mine
Allen Park, Michigan
Submitted to Wayne Disposal, Inc.
Prepared by:
Michigan Testing Engineers, Inc. {MTE}
November 24, 1981
5. Index and Design Drawings
Sheets 1 through 18
Allen Park Clay Mine Landfill
Hazardous Waste Disposal Site - Cell II
Owner: Ford Motor Company
(photocopy reductions)
Prepared by:
Midwestern Consulting, Inc. {MCI}
June 24, (year is illegible)

6. Letter Report dtd May 18, 1988
by Seiber, Keast & Assoc., Inc. {SKA}
Addressed to Mr. David S. Miller
Mining Properties
Rouge Steel Company
Dearborn, Michigan
Re: Allen Park Clay Mine
Leachate Disposal System

One particular document, discussing the vertical hydraulic gradient and its effect on contaminant transport, which may contain significant information was not part of the package reviewed for this discussion (it was, however transmitted by DNR to the City of Melvindale). This document was referenced in the NTH Liner Report and was prepared by Prof. Donald Gray of the University of Michigan, Ann Arbor in 1983. It is hereinafter referenced as the Gray Report.

One of the fundamental problems encountered in reviewing the referenced documentation relates to the Design Drawings prepared by Midwestern Consulting, Inc. {MCI}. The copies provided have been reduced from their original size of 24" x 36" to 6" x 8" with the result that virtually all text is illegible rendering the drawings essentially useless for review.

There are several concerns relating to subsoils associated with Cell II. These concerns were raised principally through the data presented in the Neyer, Tiseo & Hindo, Ltd. {NTH} Liner Engineering Report, the NTH Letter Report discussing Vertical Hydraulic Gradients and the Michigan Testing Engineers, Inc. {MTE} Hydrological Study. It is presumed these reports represent or contain all of the pertinent data relating to test borings, test wells, piezometers and soil test data developed for and relevant to the design of proposed Cell II. In addition, to the extent possible, the Design Drawings were reviewed in the context of the geotechnical information.

For the sake of continuity, reference to compass direction will be the same as that adopted in the NTH Liner Report. That is, North is toward the Southfield Expressway, East toward Oakwood Blvd., West is toward Outer Drive and Snow Rd and South is toward I-94 Expressway.

The design subsoil stratigraphy, strength and consolidation data appears to result from the two NTH borings drilled respectively near the northwest and southwest corners of proposed Cell II.

The two NTH borings encountered "hardpan" at depths consistent with the borings drilled by MTE around the exterior of the property (the property is much larger than proposed Cell II). However, it should be noted that NTH boring 1 encountered "hardpan" at approximately elev 500 while NTH boring 2 encountered it at approximately elev 515.4, some 15 feet higher. Particularly since this difference is consistent with the MTE borings, it is apparent that there is relatively sharp relief to the topography of the underlying "hardpan" formation.

The consequence of relatively sharp elevation changes in the underlying "hardpan" is that computations for slope stability and gross settlement must account for the extremes encountered. This allowance is not readily apparent in computations submitted.

The result of the NTH slope stability analysis is presented graphically on Figure I of Appendix II in the NTH Liner Report. The elevation shown for the "hardpan" to which one of the critical failure circles is tangent, is shown as elevation 515. Without an indication to the contrary in the NTH Report, it is assumed that no analyses was performed with respect to the fact that the top of "hardpan" is variable and that its limits are likely to be greater than elevation 515 and, more importantly, less than elevation 500.

Unless already accomplished, but not included in the documentation, additional slope stability analyses should be performed to account for the variable topography of the "hardpan" layer.

Strength data used for slope stability computations was apparently derived from samples recovered from the two NTH borings as well as insitu vane shear tests performed during the course of drilling the borings.

The two borings were sampled and/or tested at intervals of approximately 5 feet. Of all the samples and tests, only six strength tests (other than SPT) are reported for boring 1 and four tests for boring 2. This represents very little coverage and essentially represents about two percent of the soils within the critical zone of soil underlying the site. The use of SPT data for assessing strength is not uncommon for higher strength soils but is far from accurate, particularly in lower strength soils such as found at this site.

Unless other strength data is available from the immediate proximity of Cell II, additional data should be obtained to more fully define the strength characteristics and variability.

Based on the design drawings, Sheet 9, it appears the existing ground surface may reach approximately elevation 616 along the west side of Cell II. This is inconsistent with the elevation shown on Figure I, Appendix II of the NTH Liner Report and would have a marked effect on the overall slope stability computations.

The limited soil strength information has been "generalized" into two principal clay layers, as shown on Figure I, Appendix II of the NTH Liner Report. Are the soil properties listed on that Figure the same as those on Sheet 13/20 in the same report? The numbers on Figure I are practically illegible on the copy provided.

Slope stability computations are based on a minimum "factor of safety" of 1.2. The results of the computations as presented on Figure I, Appendix II of the NTH Liner Report indicate 1.2 and 1.4 as the computed "factor of safety" for toe and deep-seated failure respectively. These values appear to be low when considering the type of facility contemplated. NAVFAC DM-7.1, pg 329, recommends a factor of safety of not less than 1.5 for permanent or sustained loading conditions.

Since this is a critical structure, due to the materials contained and the absolute need to maintain the integrity of the liner and underdrainage/leachate collection system, it would not be inappropriate to require a higher "factor of safety" consistent with the overall risks involved and the uncertainty of the soil strengths. This is not to say that the only thing needed to satisfy the concerns outlined herein would be to increase the required "factor of safety".

Using NAVFAC DM-7.1 criteria and assuming that the overall integrity of a Hazardous Waste Cell and its infrastructure is just as "critical" as a structural foundation, then it may be warranted to increase the required factor of safety to 2 or higher. This should not be considered a specific recommendation, but should be seen as an indication of the need for risk assessment and parametric study to assure the integrity of the facility. A "factor of safety" of 1.2 may be sufficient for the risks associated with a temporary construction excavation but not for a facility of the type contemplated in this design.

In Section 3.2, the NTH Liner Report states "The analysis assumes no storage of construction materials or stockpiling of soil backfill is allowed within 100 feet of the top of the slope." There should be more specific criteria associated with this statement. For example, the analyses accounts for "traffic surcharge" but does it account for a series of parked trucks? Either a listing of allowable loads or activities should be included or the area should be deemed totally off limits. If the latter case is adopted will there still be an unacceptable risk if somehow that order is violated?

NTH stability computations indicate the existing excavation is at or near a "factor of safety" of one. This has apparently resulted in the recommendation that the bottom grade be increased and that a stabilizing berm be placed at the toe of the slope (inside the excavated area) around three sides of Cell II.

If the existing excavation has been open for an extended period of time, what changes have taken place within the soil mass which may affect the stability of the proposed Cell? Has the "rebound" had an influence on the strength? Will this impact the consolidation characteristics? How have these factors been addressed in the overall design? Has there been any attempt to assess the amount of mass movement which may have occurred as a result of overexcavating the area?

With respect to the low factor of safety associated with the existing conditions, it would appear that (depending on the amount of time the area has been open) there is a potential of some loss of strength due to remolding or soil strains accompanying the loading imposed by the overexcavation. Thus, the use of only two borings and very limited strength data may be inappropriate for the conditions at this site particularly since the borings may be outside the area(s) of greatest disturbance.

Settlement computations are based on only one consolidation test even though the profile has been generalized into two principal clay zones with their interface at elevation 535. The upper zone consolidation properties have been derived from index tests as reported on Sheet 14/20 of Appendix II in the NTH Liner Report. Also, as indicated on that sheet the consolidation characteristics of soil beneath elevation 535 was derived from a single consolidation test.

The manner in which this data is used is confusing. The consolidation test was performed on sample PS-1 from NTH boring 2 which was obtained at elevation 541.4 which is in the UPPER zone of the assumed profile used for computations. Based on the data on hand (which may be incomplete) it would

appear that the settlement analyses is misleading or incorrect and should be performed again (preferably using more rigorous techniques and covering more conditions such as the variable topography of the "hardpan").

Furthermore, considering the potential effects on the leachate drainage system, it appears that much additional testing and analyses should be required prior to accepting the analyses and accompanying design as complete.

As with the stability computations, it is noted that the ground surface along the west edge of Cell II may reach elevation 616. Is this a temporary condition or is it permanent and how long has it been there if it is not part of the original landform? In either case how will its presence or removal affect settlement of Cell II?

The system comprising the liner and leachate/underdrainage infrastructure is critical to the long-term performance of the facility and as such warrants close attention with respect to the influence of differential movements. It is the writer's opinion that significant additional analyses is needed to address the effects of both past and potential future operations as well as those planned for within Cell II on the integrity of Cell II.

The computations on Sheet 16/20, Appendix II in the NTH Liner Report indicate an assumed total unit weight of "waste" of 75pcf. Is this a reasonable assumption? It has been the writer's understanding that the principal material entering the pit would be foundry sand. What assumptions are implicit in a Total unit weight of waste of 75pcf? Is the waste material going to be principally contained liquid?

The areas surrounding proposed Cell II have apparently received wastes of varying types since about 1957. Based on verbal descriptions, initially waste was completely unconfined in some areas of the site. Subsequently, Cell I was constructed to receive wastes and was designed with an underdrainage system but was not provided with a synthetic liner and does not meet the current Act 64 requirements.

Previous filling operations in conjunction with the Gray Report of 1983 relating to the positive upward hydraulic gradient at the site, raise questions regarding migration of contaminants through the old fill and ultimately off-site either via the existing drains or through the upper layer of sand. There is insufficient data within the documents provided to positively conclude that there is or is not off-site migration. Furthermore, according to comments made during the public hearing no recent tests are available regarding groundwater quality and there have been only two sets of data taken in the last several years (this may or may not be the case and can only be substantiated by

reviewing records which are not currently available for verification with respect to the timing required for this letter to fall within the so-called "public comment period" deadline of September 17).

If the assumptions are correct with respect to the few number of water quality tests then it is completely inappropriate to consider elimination of the monitoring program. If there was to be any relaxation at all, then it should only be applied to monitoring of the deep aquifer and not to the upper level groundwater monitoring.

There is insufficient data to adequately address the subject but it is assumed that there are SHALLOW monitoring wells located near the juncture of the property lines and the old drains which traverse(d) the site. If not, there should be. Based on the groundwater quality data presented in the MTE Hydrogeological Study there is sufficient justification to warrant continued monitoring.

The comments contained in this document should not be construed as "finding" that the subsurface conditions are unacceptable for an Act 64 facility. To the contrary, the general subsurface conditions are acceptable under this writer's interpretation of the requirements of Act 64. However, the permit process should not continue until additional analyses and design information is developed and the question of offsite movement of contaminants through groundwater flow has been fully addressed.

The communities surrounding the facility have made it clear that they are opposed to the facility, particularly as presently proposed. There is strenuous objection to the apparent attempt to circumnavigate the intent of Act 64 as currently written to, in effect, eliminate the communities impacted from contributing to the siting process. There are many questions, related to the implications of the "Snow Wood" report, contamination of the upper groundwater regime, the type and quantities of wastes dumped at the facility in the past as well as those proposed for the new facility.

Act 64 recognizes the need to have this type of facility and provides for limiting the veto power of local communities. At the same time however, the Act also provides for the communities to be involved in the siting and design process by virtue of the negotiating power vested in the Site Review Board. In this case, for what ever reason, this interplay has been eliminated, to the detriment of all parties involved.

Since, under the application, the inventory of materials which can be deposited at the site has been significantly increased, it would appear that the facility should be considered "new" and not just simply an extension of an "interim" status. This argument extends to not only the potential impacts to the surrounding neighborhoods but also to impacts on traffic safety and the integrity of shipments from out-state into a highly congested region of Metropolitan Detroit.

It is urged that the Department undertake to assure that either the Site Review Board is created or through less formal mechanism a means of providing for negotiation between the parties and the communities involved. If the second channel is the only one available, some provision must be made to assure that the outcome of the negotiations is binding on the principal parties involved.

Should you have any questions, do not hesitate to call.

Sincerely,

GeoDynamics Consultants, Inc.,



Timothy Carpenter, P.E.

cc L. Coogan, City of Melvindale
Mayor T. Coogan, City of Melvindale
B. Tiseo, P.E., Neyer, Tiseo & Hindo, Ltd.

Mr. & Mrs. Norman D. Jagger
1676 Linden
Dearborn, MI 48124
September 17, 1988

RECEIVED
SEP 19 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

David Petrovski
U. S. Environmental Protection Agency
5H S-13
230 S. Dearborn
Chicago, IL 60604

Attention: David Petrovski

Regarding: EPA File Number MID 980-568-711

We attended a public concerns meeting regarding the FORD MOTOR COMPANY ALLEN PARK CLAY MINE HAZARDOUS WASTE LANDFILL on Thursday, September 15 at the Allen Park Civic Center.

That meeting, attended by 300-400 people, begun at approximately 7:15 p.m. did not break up until 11:30 p.m.

As we were returning home at the intersection of Southfield and Oakwood our car filled with strong offensive odors. Just two blocks from that intersection, just two blocks from the landfill, in our home the windows had to be kept closed because of strong offensive odors. It is not unusual to get up during a summer night finding it necessary to close all windows because of strong offensive odors.

Now there is soot on the windowsills. It is routine to wash all windowsills after rain because of grime left behind. Black grime is routine in housecleaning water reenforced with Clorox, dust cloths, clothes hung out to dry, driveways, freshly fallen snow, etc.

I drove the entire perimeter of the landfill on Friday, September 16 looking for posted hazardous waste/toxic landfill signs. The only posted signs are those stating warnings of danger to unauthorized personnel.

The verbal quotations by residents of Snow Woods of neighborhood cancer incidents is astounding. We suggest it is reasonable to assume similar figures could be discovered in Melvindale, Allen Park, and Detroit along the residential boundaries of the landfill.

At the meeting people's concerns were aired:

- children have entered the forbidden territory.
- what kind of water is in capped wells.
- young adults played in the area as young children.
- high cancer incidence needs indepth research.
- what about planned water use for Ford golf course.
- what is in the air we are breathing.
- home furnishings are filthy/destroyed by foul air.
- lack of information to local officials and residents.
- location of hazardous/toxic waste in residential neighborhood.
- potential collapse into underground salt mines.
- unknown pollutants dumped before regulations were in effect.
- MDNR/EPA/FMC indifference for local residents health and property.
- MDNR/EPA/FMC indifference for potential concerns of Veterans Administration and Oakwood Hospitals.
- lack of personal knowledge that the hazardous/toxic waste dump exists.
- create a bubble over the entire landfill area.
- another adequately publicized meeting could bring out 3,400 concerned residents.
- violations of regulation, need for new regulations.
- 3:00 a.m. dumpings by people wearing hoods.

At the meeting citizens as well as officials implored the MDNR/EPA representatives to conduct more research, seriously consider their concerns, and say "NO" to Ford Motor Company.

The resounding message by the citizens was "NO MORE".

It is our supportive opinion that the citizens have good sound reason to beg the MDNR/EPA to conduct more research, to correct existing conditions potentially harmful to humanity, and to ultimately say "NO" to Ford Motor Company.

Sincerely,


Mr. & Mrs. Norman D. Jagger

September 16, 1988

Peter Quackenbush
Mich. Dept. of Natural Resources
Waste Management Division
P.O. Box 30038
Ottawa Street Building - South Tower
Lansing, MI 48909

I am writing in protest of the Ford Motor Company Clay Mine
Hazardous Waste Landfill - EPA File #MID 980-568-711.

I have lived in this community for several years. I like
the community and wish to stay for several more years.

I am extremely concerned with the thought of additional
hazardous chemicals being stored in such a populated area. Over
the last several years the news media has released stories of
dangerous seepage from such chemicals, a higher rate of cancer
possibly being caused by same, and a higher percentage of birth
defects.

This area is populated in large by young families. Families
with small children, women of child bearing years. These small
children and the children to come are the future of this country.
I want to see that they get a chance at life too. A life as free
of cancer and birth defects as possible. It's a sad sight to
watch a child die or lose their chances at a normal, healthy,
happy life.

I don't feel we, as a scientific nation, have enough know-
ledge in the area of chemical waste storage to be possibly en-
dangering so many lives.

Sincerely,

Fred J. Krolczyk
4211 Lewis
Resident

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Waste Management
Division

Fred J. Krolczyk

